

Policy Manual Update: 3.36 Conflicts of Interest (proposed)

This draft policy reflects updates recommended by the lawyer and provides additional clarification for staff to be in compliance with all regulations.

Final Proposed Policy:

CRRL expects that all employees will observe the highest moral and ethical standards in any dealings in which they represent the Library. Employees are required to avoid activities which may create a conflict of interest with their responsibilities to CRRL. Failure to do so will result in immediate disciplinary action, up to and including termination of employment.

The following are some examples, but not the only situations, giving rise to personal conflicts of interest:

- Legal Requirements. No employee will do anything in the conduct of business which would violate any local, state, or federal law.
- Awards of Contracts. Employees in a position to award contracts on behalf of CRRL must disclose any interest held in a company seeking to do business with the Library and, at the discretion of the Executive Director, may be disqualified from the contract award decision.
- Accepting gifts/entertainment. Any receipt of gifts must be in compliance with the Virginia State and Local Government Conflict of Interests Act ("VCOIA") and any other state or federal laws or local ordinances. No employee shall accept gifts of more than a nominal value from any individual or company who does business with the Library. Gifts may not be accepted where they would reasonably tend to influence the employee in the

performance of their official duties. In no circumstances should employees accept gifts from any person or individual who seeks to do business with the Library or which has interests that may be substantially affected by the performance of the employee's official duties.

All CRRL resources are to be used appropriately in accordance with applicable laws.

Proposed with edits:

Lawyer recommended updates are red

CRRL expects that all employees will observe the highest moral and ethical standards in any dealings in which they represent the Library. Employees are required to avoid activities which may create a conflict of interest with their responsibilities to CRRL. Failure to do so will result in immediate disciplinary action, up to and including termination of employment.

The following are some examples, but not the only situations, giving rise to personal conflicts of interest:

- Legal Requirements. No employee will do anything in the conduct of business which would violate any local, state, or federal law.
- Awards of Contracts. Employees in a position to award contracts on behalf of CRRL must disclose any interest held in a company seeking to do business with the Library and, at the discretion of the Executive Director, may be disqualified from the contract award decision.
- Accepting gifts/entertainment. Any receipt of gifts must be in compliance with the Virginia State and Local Government

Conflict of Interests Act ("VCOIA") and any other state or federal laws or local ordinances. No employee shall accept gifts of more than a nominal value from any individual or company who does business with CRRL. Gifts may not be accepted where they would reasonably tend to influence the employee in the performance of their official duties. In no circumstances should employees accept gifts from any person or individual who seeks to do business with the Library or which has interests that may be substantially affected by the performance of the employee's official duties.

All CRRL resources are to be used appropriately in accordance with applicable laws.

Current:

3.36 Conflicts Of Interest

CRRL expects that all employees will observe the highest moral and ethical standards in any dealings in which they represent the Library. Employees are required to avoid activities which may create a conflict of interest with their responsibilities to CRRL. Failure to do so will result in immediate disciplinary action, up to and including termination of employment.

The following are some examples, but not the only situations, giving rise to personal conflicts of interest:

- Legal Requirements. No employee will do anything in the conduct of business which would violate any local, state, or federal law.

- Awards of Contracts. Employees in a position to award contracts on behalf of CRRL must disclose any interest held in a company seeking to do business with the Library and, at the discretion of the Executive Director, may be disqualified from the contract award decision.
- Accepting gifts/entertainment. No employee shall accept gifts of more than a nominal value from any individual or company who does business or seeks to do business with CRRL.

All CRRL resources are to be used appropriately in accordance with applicable laws.