



COMMUNITY
FOUNDATION
of Middlesex County

Confidentiality and Anonymity Policy And Conflict of Interest Resolution and Disclosure Form

In accordance with the guidelines and requirements of the Community Foundation of Middlesex County's accreditation through the National Standards of Community Foundations, all board members, committee members, employees, volunteers, and consultants annually are required to review and sign a written acknowledgement of the confidentiality and anonymity policy and the conflict of interest resolution as well as submit a completed conflict of interest form.

POLICY RE: CONFIDENTIALITY AND ANONYMITY

Through the course of service in the capacity as the board of directors, committee members, staff, consultants and volunteers of the Community Foundation, individuals will have access to and become acquainted with information of a confidential, sensitive and/or proprietary nature. The protection of confidential, sensitive, and proprietary information is of utmost importance to the continued viability and success of the Community Foundation. The information may pertain to present or future clients of the Foundation, Foundation contributors, volunteers, business associates or past or current employees. No member of the Foundation will provide any information in response to a subpoena or other form of request without consulting legal counsel to the Foundation. All other requests for or releases of information concerning a donor will be honored and allowed only if permission is obtained from the donor prior to the release of such information.

Documents containing confidential and proprietary information which are made available to board and committee members in hard copy and through any electronic transmission, including the Foundation's Board and Committee Portal are protected under this policy. Board and Committee members agree to restrict access to such hard copy documents and electronic transmissions, including access to the Board and Committee Portal, to themselves and/or a Foundation approved representative.

It is the Community Foundation's policy not to release, sell or license any information in its database without a donor's consent. A donor's expressed wishes for public anonymity will be respected. Internally, only those individuals with a need to know for legal, processing or other substantive reasons will know the donor's name or details of the gift. The Community Foundation has the fundamental responsibility for the maintenance and protection of such information. Members of the Foundation are charged with taking adequate steps to safeguard such information and to insure that the information is not used in any manner that is unauthorized, or that is detrimental to the best interests of the Foundation or its clients. Members shall not disclose or otherwise utilize the above-referenced information for any purpose outside the scope of their service at the Community Foundation.

The Community Foundation respects the privacy rights of its employees, both past and current, and maintains its personnel matters and records in the strictest of confidence. While in their capacity at the Community Foundation, members may have access to or become acquainted with information concerning past and current Foundation employees, personnel matters, salary and pay scale information. Such information shall not be communicated, disclosed or otherwise utilized for any unauthorized purpose, whether such information was gained within or outside the scope of the service at the Community Foundation. Anyone receiving inquiries or requests for information concerning past or current Foundation employees, personnel matters or records, or information concerning Foundation salaries or pay scales shall immediately notify the President/CEO.

I agree to comply with the above Confidentiality and Anonymity Policy of the Community Foundation of Middlesex County.

I certify that my printed name as stated and assigned below constitutes my signature and may be accepted as such.

Full Name

Date

I am: (please check your role with CFMC)

Board Member

Committee Member

CFMC staff

Volunteer

Consultant

Other:

Policy Approved by the Board of Directors: December 15, 2015

(please continue to the next pages to complete the conflict of interest section)

CONFLICT OF INTEREST RESOLUTION*

- I. The Community Foundation of Middlesex County (the “Foundation”) recognizes that the Foundation must avoid conflicts of interest and the appearance of conflicts.
- II. The Foundation recognizes that its staff, members of the board and its committees, volunteers, and their respective families, serve as employees, volunteers and consultants for organizations that may seek funding from the Foundation or receive its investment funds.
- III. To avoid conflicts of interest and to minimize the impact where conflicts are unavoidable, staff and board members, and members of all committees including non-board volunteers, are required to:
 - A. Disclose to the President (or in the case of the President or a Board Member, to the Board) participation by themselves or a Related Person as a board member, employee, consultant or representative for any organization that seeks funding from the Foundation, or any entity with which the Foundation is investing or contemplating investing funds. For the purpose of this Resolution, a “Related Person” is one or more of the persons or entities enumerated in Article V, Section 5.2 of the Foundation's Bylaws.
 - B. Disclose to the President (or in the case of the President or a Board member, to the Board) any other business or financial transaction between themselves or a Related Person and the Foundation.
 - C. Recuse themselves from involvement in any decision or discussion in which they or a Related Person have a business or financial interest, unless otherwise approved by the Board as provided in Article V, Section 5.2 of the Foundation’s Bylaws.
- IV. The board shall keep a list, to be updated annually, of the organizations on which board members, committee members, staff, volunteers and Related Persons serve. In the interests of minimizing the potential for conflicts of interest, it is desirable, but not required, that no more than two board members serve as members of any one community board or serve as fund-raisers for the same organization.
- V. Lobbying by grant applicants throughout the application process with any member of the board or committee is considered inappropriate and unacceptable. When such contact is made, the board or committee member is expected to notify the Foundation staff and refer the applicant to the staff for discussion of the issue or application.
- VI. Board, committee members and staff are prohibited from accepting gifts of more than nominal (\$25) value from applicants or those seeking investment funds from the Foundation.
- VII. Any Board, committee member or staff member who becomes aware of a potential violation of these provisions shall report such suspected violation following the procedures set forth in the Whistleblower Policy, Section 4 “Reporting Violations.” Potential violations shall be handled by the procedures set forth in the Whistleblower Policy, Section 5 “Compliance Responsibility,” Section 8 “Confidentiality,” and Section 9 “Handling of Reported Violations.”

* All references to the Board include any committees of the Board, including those with non-board members.

Note: All Board of Directors members, committee members, volunteers, and staff will complete a new Conflict of Interest Disclosure annually in January for the upcoming fiscal year, even if there are no changes to an individual’s statement.

Immediate Family Member Organizational Involvements (Continue on back, if necessary)

Organization	Position/ Involvement	Immediate Family member

Family relationship or a business relationship with any other officer, director, trustee or key employee:

Organization	Position/ Involvement

I certify that my printed name as stated and assigned below constitutes my signature and may be accepted as such.

Full Name

Date