



THE COMMUNITY FOUNDATION OF FREDERICK

Conflict of Interest Statement and Policies General Confidentiality Statement and Policies Grant Applicant and Scholarship Applicant Confidentiality Statement and Policies Social Media Statement and Policies

Approved by the Board of Trustees 6.24.22

I. Conflict of Interest Statement and Policies

All members of the Community Foundation's Board of Trustees, staff, volunteers, and members of its standing and ad hoc committees must avoid any conflict, or appearance of conflict, between their personal interests and the interests of the Community Foundation. This policy applies to individuals or organizations having, seeking to have, or being in a position to influence business or funding relationships with the Community Foundation.

All members of the Community Foundation's Board of Trustees, staff, volunteers, and members of its standing and ad hoc committees shall sign page 9 of this policy statement, entitled **The Community Foundation of Frederick County Conflict and Confidentiality Statement and Attestation** as their acknowledgement of these policies and their agreement to abide by them.

Additionally, the Board of Trustees, key staff, and standing committee members must annually submit disclosure statements to identify potential and real conflicts of interest.

No member of the Board of Trustees, staff, committee member, or volunteer shall knowingly take any action or make any statement intended to influence the conduct of the Community Foundation in such a way as to confer any benefit on such trustee, staff, committee member, or volunteer or on any entity in which he or she has a significant interest as stockholder, director, officer, or employee or on any family member or relative. The following policies apply:

- A. In the event that a matter comes before the Board of Trustees, staff, committee member or volunteer that raises a potential conflict of interest, the individual shall disclose the conflict as soon as he or she becomes aware of it, and the disclosure shall be recorded in the minutes of the meeting. The trustee, staff, committee member, or volunteer shall not be physically present during the Board's final discussion and vote on the issue.
- B. Any member of the Board of Trustees or committee member who is aware of a potential conflict of interest with respect to any matter coming before

the Board or committee shall not vote in connection with that matter.

- C. The Chairman of the Board of Trustees, committee chair, and the President and CEO shall consult on all conflict of interest statements or actions and report to the Board or the respective committee on their recommendations for any action that may be necessary.
- D. These guidelines shall not prevent or discourage any member of the Board of Trustees, staff, committee member, or volunteer from disclosing relevant information to which he or she has knowledge or from answering questions or stating a position with respect to any matter.

These guidelines are to be adhered to in conjunction with the standards imposed on members of the Board of Trustees in Article II, Section 2.15 of The Community Foundation of Frederick County's Bylaws. The guidelines supplement, but do not replace, the bylaw standards for Trustees.

II. General Confidentiality Statement and Policies

Information concerning personnel, beneficiaries, donors, applicants, and business activities of The Community Foundation of Frederick County, MD, Inc. is privileged and confidential. Additionally, all items discussed at Board of Trustees and committee meetings are deemed confidential, except for general information that Trustees and committee members need to perform their responsibility as an ambassador for the organization. The following policies apply:

- A. Trustees, committee members, staff, and volunteers shall not copy, read, discuss or distribute any portion of confidential information to another person without authorization from the Chairman or President and CEO, or by resolution of the Board of Trustees.
- B. A breach of confidentiality may result in legal action and/or dismissal from the Board of Trustees, committee, or staff. The Executive Committee will make decisions regarding to whom and under what conditions the information shall be released.
- C. For questions regarding what is or is not appropriate to discuss outside of the Community Foundation or permission to make a public disclosure of information that is otherwise confidential, please contact the President and CEO.
- D. No donor record, grant or scholarship application, personnel record, including remuneration, or any portion thereof shall be made available and no reports shall be made on any person or activity unless:
 - 1. It is required by law to do so, such as being subpoenaed when an

incident of child abuse is disclosed, or a person is harming or is threatening to harm themselves or others.

2. It has been approved by the donor to and/or the beneficiary of a fund or the applicant.
3. It is necessary for providing a reference for a current or former employee and the person has given permission in writing for such information to be disclosed.
4. It is necessary for the proper administration of The Community Foundation of Frederick County, MD, Inc. in general and there is nothing in the information that will identify the person or any other person.
5. It is information requested by a funding body or federal agency that the Chairman, President and CEO or by resolution of the Board of Trustees, deems necessary to be released.

E. Procedures regarding confidentiality are as follows:

1. Upon being elected to the Board of Trustees or appointed to a committee, all Trustees and committee members are required to sign a Confidentiality Statement.
2. Requests for information from parties outside of the Trustees or committee members:
 - a. When parties not associated with the Board of Trustees or a committee request information, Trustees, committee members, staff, and volunteers must state that they are not authorized to release any information concerning personnel, beneficiaries, applications, donors, or Community Foundation business. The request should then be referred to the Executive Committee.
 - b. Requests for information that fall under the Maryland Charitable Solicitations Act may be directed to Maryland Secretary of State, State House, Annapolis, MD 21401 or by calling 410.974.5534. A fee covering the cost of postage and copies may be required. A request for the Community Foundation's current financial information should be made to the President and CEO and may be released without approval from the Executive Committee. The form 990/990T, an annual reporting return filed by the Community Foundation with the IRS is available on the website at www.FrederickCountyGives.org/reports.
3. Requests for information from media:

- a. General informational requests from the media must be referred to the President and CEO. Informational requests on personnel and compensation issues must be referred to the Executive Committee.
 - b. When approached by the media, Trustees, committee members, staff and volunteers are advised to note their position within the Community Foundation but are advised to refer any public comments to the President and CEO. The President and CEO may also request the Chairman to provide the response.
4. If a Trustee, committee member, staff or volunteer is suspected of breaching confidentiality, the Executive Committee, in consultation with the Governance Committee, will address the issue.

III. Grant and Scholarship Applicant Statement and Policies

The nature of the Community Foundation's role as a funder, leader, convener and decision-maker in the community results in the acquisition of extensive information from grant and scholarship applicants (collectively referenced as "applicants") that is considered privileged. The Community Foundation staff, Board of Trustees, and Grants Committee and Scholarship Committee members may be exposed to or have access to the personal, financial, business, and deliberative information of the Community Foundation, grant applicants, grantees, scholarship applicants and scholars. This confidential information is shared with the Community Foundation because of its reputation for trust and its ability to make fair decisions. The information may not be disclosed or discussed with anyone for any purpose other than that required and allowed by the Community Foundation.

To safeguard the Community Foundation's integrity as a responsible decision-maker, to protect its capacity to gather data necessary to make those decisions, and to enable it to responsibly carry out its important duties in the community, the Community Foundation subscribes to the policy on grantee confidentiality set forth below.

A. Policy Statement:

The Community Foundation staff, Board of Trustees, and Grants Committee and Scholarship Committee members shall not engage in private discussions of or otherwise disclose to third-parties information provided by applicants (except when engaged in the conduct of the proper business of the Community Foundation).

For questions regarding what is or is not appropriate to discuss outside of the Community Foundation or permission to make a public disclosure of information that is otherwise confidential, please contact the President and CEO.

All information that is not a matter of public record, or not otherwise authorized by

the appropriate authority (i.e., the President and CEO, and Board of Trustees) to be disclosed as public, shall be considered confidential. In furtherance, and not in limitation of this policy, the following shall apply:

1. The Community Foundation staff, Board of Trustees, and Grants Committee and Scholarship Committee members will not:
 - a. Disclose the identity of applicants except as necessary to process the application.
 - b. Publicly disclose or discuss confidential information provided by applicants.
 - c. Disclose confidential information about individuals who are beneficiaries of charitable activities funded by the Community Foundation without those individuals' consent.
 - d. Disclose decisions of the Board of Trustees, Grants Committee, Scholarship Committee or staff without appropriate authorization.

2. Material and Information

All material provided (including documents, reports, records, data, minutes, or analysis of information) about an applicant as part of the grantmaking and scholarship processes, and all discussion that takes place as part of the grantmaking and scholarship processes, whether through individual conversation with staff or discussion at a board meeting or committee meeting, is confidential and shall not be shared outside of official meetings and processes. This includes positions or statements made by individual trustees, Grants Committee members, Scholarship Committee members, and staff. It also includes information regarding donors, pending and current donations, contracts, and financial and business information about the Community Foundation.

3. Reporting

The Community Foundation routinely reports information about:

- a. Grantee organization's name, grant purpose, amount, and results.
- b. Scholar's name, educational institution attending, and amount.

IV. Social Media Statement and Policies

This policy applies to the Community Foundation, trustees, staff, volunteers, and committee members who may possess confidential or proprietary information about the Community Foundation. This policy refers to such persons as “Community Foundation personnel.”

To communicate freely and openly with donors, grantees, and members of the public, the Community Foundation itself maintains a social media presence through its website, Facebook, Twitter, LinkedIn, Instagram, and blog. The Community Foundation continually seeks out new and improved methods of communication and will add different forms of social media as it deems appropriate. Accordingly, the Community Foundation has given authority to certain Community Foundation personnel to maintain its social media presence and may invite others to submit postings. This policy does not cover these activities.

The Community Foundation takes no position on an individual’s decision to start or maintain a blog or participate in other social media or social networking (collectively referred to as “Social Media”) activities. However, it is the right and duty of the Community Foundation to protect itself from unauthorized disclosure of confidential and/or proprietary information and from having Community Foundation personnel indicate that they are speaking on behalf of the Community Foundation when they are not authorized to do so.

Social Media includes, but is not limited to, personal blogs; sites such as Facebook, LinkedIn, Instagram, and Twitter; video or wiki postings; chat rooms; personal websites; or other similar forms of online journals, diaries, or personal newsletters not affiliated with the Community Foundation.

A. Personal Use of Social Media

The Community Foundation respects the right of its personnel to write blogs and use social media and social networking sites. The Community Foundation does not want to discourage its personnel from self-publishing and self-expression, and the Community Foundation takes a neutral position toward personnel who use Social Media in connection with personal interests and affiliations, or for other lawful purposes.

However, Community Foundation personnel are expected to follow the guidelines and policies set forth to make clear that all comments and posts are made by the individual and not as an employee, agent, or representative of the Community Foundation.

Unless specifically authorized in writing by the President and CEO or Chairman of the Board of Trustees, Community Foundation personnel are not authorized to, and therefore are restricted from:

1. Speaking on behalf of the Community Foundation through Social Media.

Community Foundation personnel must adhere to the Community Foundation's Policy on Confidentiality in their use of Social Media. This means they may not discuss any confidential and/or proprietary work-related matters or information through Social Media.

2. Posting through Social Media confidential and/or proprietary donor, grantee or Community Foundation-related documents, or post any information that would violate the Community Foundation's Policy on Confidentiality.

B. Additional responsibilities:

1. Individuals are personally responsible for their commentary and posts through Social Media.
2. Individuals can be held personally liable for commentary that is considered defamatory, threatening, intimidating, harassing, obscene, proprietary or libelous.
3. As with all personal use of the Community Foundation's information technology resources, use of the Community Foundation's IT resources to conduct personal Social Media activities should be kept to a minimum and not disrupt work activities. Excessive or inappropriate personal use of the Community Foundation's IT resources for Social Media purposes will be subject to disciplinary action, up to and including termination.
4. When using Social Media for personal use, individuals must use their personal e-mail address and may not use their Community Foundation e-mail address as their means of identification and communication.
5. Staff may use their work email address for using Social Media that is work-related.
6. Personal photos, political opinions, information or activities that are confidential to the Community Foundation, and other postings that do not convey any aspect of the Community Foundation in the best light or pose a reputational risk to the organization or personnel are to be avoided. Violation(s) may result in disciplinary action, up to and including termination.
7. Personnel identifying themselves as a Community Foundation employee, board member, or volunteer through Social Media may be viewed as a spokesperson for the Community Foundation by readers. Because of this possibility, individuals should state they are speaking on behalf of themselves and that all comments, posts, and views expressed are their

own and they are not authorized to speak on behalf of the Community Foundation.

C. Monitoring

Community Foundation personnel are cautioned that they should have no expectation of privacy while using Social Media as postings can be reviewed by anyone, including the Community Foundation. The Community Foundation will monitor comments, posts, blogs, forums, and discussions about the Community Foundation, its personnel, its donors, its grantees, its constituents, and community that are posted on the Internet or otherwise publicly available.

D. Reporting Violations

The Community Foundation requests and strongly urges employees and volunteers to report any violations, or possible or perceived violations, of this policy to supervisors or the President and CEO. Board members and volunteers are encouraged to report violations to the Chairman of the Board of Trustees or the President and CEO. The Community Foundation would request that employees and volunteers provide a snapshot and/or printout of the page(s) believed to contain the violation so that the Community Foundation may examine the entire context of the alleged violation.

E. Discipline for Violations

In the case of Community Foundation employees, violation of the Community Foundation's Social Media policy will result in disciplinary action, up to and including termination, depending on the nature and severity of the violation. The Community Foundation reserves the right to take legal action against personnel who engage in prohibited or unlawful conduct. Violations by members of the board and other volunteers may lead to dismissal from the board or committee on which the volunteer serves.

The Community Foundation of Frederick County Conflict and Confidentiality Statement and Attestation

I am a: ___ Board of Trustee member ___ Committee member
 ___ Other Volunteer ___ Staff member

I have been given a copy of the Conflict of Interest Statement and Policies, General Confidentiality Statement and Policies, Grant Applicant and Scholarship Applicant Confidentiality Statement and Policies, and Social Media Statement and Policies.

I have read it and understand it. My signature below indicates that I agree to abide by all policies.

Additionally, my signature below indicates that I have not made any agreements, written, verbal or acknowledged, to vote in any way other than with my good judgment and conscience and that I have not agreed to exchange votes with any party.

Signature

Date

Printed Name