



ALAMO
COLLEGES
FOUNDATION

Confidentiality, Document Security and Conflict of Interest Policy

Confidentiality and Document Security

The Alamo Colleges Foundation believes that it is important for all scholarship volunteers and staff to maintain the confidentiality of private student information. Protecting the privacy of a student's personal information is also required by state and federal regulations.

1. Scholarship volunteers will not discuss private student financial or personal information outside of a committee meeting.
2. Scholarship volunteers will keep all paper and/or electronic application materials-including, but not limited to, applications, ranking reports, and supplemental materials-in a secure location or secure computer during selection.

Conflict of Interest

Scholarship volunteers must be able to make independent recommendations regarding scholarship funds without potential or perceived influence caused by a conflict of interest or even the appearance of a conflict of interest (e.g., when the action of a donor/scholarship volunteer results in a direct financial benefit to a person closely related to the donor/scholarship volunteer). They must evaluate the eligibility of applicants without bias and make selection recommendations based on the established objective criteria.

1. Applicants must be evaluated based on fair and equitable criteria established prior to the review process.
 2. No scholarship volunteers shall be eligible to apply for assistance from the scholarship fund.
 3. If a family member¹ of a scholarship volunteer has applied for assistance, that scholarship volunteer will declare a conflict of interest and will not be present during the review and selection process for that particular awarding cycle.
 4. If an applicant (or his/her family) has a financial relationship² with a scholarship volunteer, that scholarship volunteer will declare a conflict of interest, withdraw from reading the application materials, withdraw from the meeting until discussion of that applicant has been completed (if applicable), and refrain from voting on/scoring that applicant.
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¹ "Family member" is defined as legal spouse, parent, child/stepchild/ adopted child and their legal spouses, grandchild/step-grandchild and their legal spouses, siblings and their legal spouses, niece/nephew and their legal spouses, or in-law.

² "Financial relationship" is defined as someone with, directly or indirectly, a business, investment, or family interest such as: an ownership or investment interest in any entity with which the scholarship volunteer has a transaction or arrangement; a compensation arrangement; or a potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the scholarship volunteer is negotiating a transaction or arrangement. Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.