

## Staff Conflict of Interest Policy

**Policy Contact:** Director, Legal Affairs and Corporate Secretary

**Date of last revision:** January 9, 2019

**Department:** Legal Affairs

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### 1. PURPOSE

This document is intended to inform staff of the policy of the Pew Research Center (Center) regarding employees' affiliations with external organizations and provide consistent guidance for identifying and handling potential and actual conflicts of interest. The Center firmly believes in the professional development of all staff and recognizes that affiliations are an effective opportunity for developing specialized skills, abilities and leadership traits. The policy requires each staff member to communicate fully with management regarding any affiliation that could affect the impartial fulfillment of her/his role at the Center.

### 2. POLICY

The Center is committed to the highest levels of integrity. Staff are expected to conduct their duties for the Center and their affiliations with outside organizations with objectivity and honesty. It is the Center's policy that staff must avoid impropriety or the appearance of impropriety and disclose potential legal, financial, and other conflicts of interest involving the Center. A Center employee is required to recuse her/himself from any activity or decision as to which there might reasonably be a conflict of interest between that employee, or her/his Immediate Family Member, and an organization with which they have an affiliation. Lastly, staff may not reference their employment with the Center in any publicly disclosed materials (including websites) with regard to their activities outside of work, even if they are involved with an organization in a purely volunteer capacity that does not require pre-approval under this policy. This prohibition does not apply to board biographies for approved affiliations.

### 3. DEFINITIONS

- (a) **Affiliation:** 1) A paid or unpaid position held as an employee, teacher, writer, consultant, officer, trustee, director, board member, or other official position with an organization,

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governmental entity, or company other than the Center, or 2) an unpaid volunteer position with an organization, governmental entity, or company other than the Center that publicly recognizes the employee's role such as listing their name on the website. The following are not considered affiliations under this policy and need not be reported: (1) strictly volunteer positions without decision-making authority, remuneration or public recognition and (2) speaking engagements, presentations, media interviews, briefings, publications, op-eds or other public statements ("Center-Related External Communications") that staff accept in furtherance of the Center's goals and work. Center- Related External Communications are addressed in the [External Communications Policy](#).

**(b) Immediate Family Member:** A staff member's parents, spouse, domestic partner, and children **ONLY** when they reside in the same household with the staff member.

**(c) Non-profit Organization:** All non-profit organizations, including government entities, except that staff do not need to report affiliations with religious houses of worship, social clubs (e.g., athletic or recreational clubs), or residential organizations (e.g., homeowners' associations).

**(d) Remuneration:** Compensation of any type for work performed, including salary or wages; retirement benefits; fringe benefits (e.g., payment for, or reimbursement of meals, lodging, travel, educational benefits, or low-interest loans), or bonuses. Remuneration does not include in-kind benefits valued at \$500 or less per year customarily given in return for work performed on a part-time basis (e.g., discounted or free athletic or country club memberships or other similar non-cash benefits). Questions regarding this provision should be directed to [COI@pewresearch.org](mailto:COI@pewresearch.org).

**(e) Expenditure Authority:** Authority to sign contracts, or authorize payments at the Center, in accordance with the [Delegation and Expenditure Authority Policy](#).

**(f) Staff:** All employees of the Center.

## 4. REPORTING AFFILIATIONS

**(a) Affiliations (All staff):** Each staff member must disclose all affiliations that she/he maintains with non-profit or for-profit organizations.

**(b) Affiliations (Staff *with* expenditure authority):** In addition to a staff member's affiliations, each staff member who has expenditure authority must also disclose affiliations of her/his immediate family members.

## 5. DISCLOSURE

**(a) Disclosure Prior to Commencing Employment:** Prior to commencing employment,

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each staff member must submit an Employee Disclosure Statement (Disclosure Statement) with a list of all affiliations that she/he or her/his immediate family members, if required, maintained during the preceding year.<sup>1</sup> Newly hired staff need not list former employers unless (1) the Center regularly works with such former employer or (2) the staff member expects to maintain an ongoing affiliation with any such former employer.

(b) **Annual Disclosure Statements:** Staff will be prompted to complete their annual Disclosure Statement each December. Affiliations of staff at the level of managing director and above will be reported to the executive committee of the Center's board on an annual basis.

(c) **Updating Disclosure Statements:** Staff are required to immediately report any change in her/his own (and, if applicable, her/his immediate family members') affiliations by sending an updated Disclosure Statement via e-mail to [COI@pewresearch.org](mailto:COI@pewresearch.org). Staff must follow the approval process outlined below, if needed.

### 6. AFFILIATION LIMITATIONS

(a) **Number of affiliations:** Unless approved in advance by the president, staff are permitted to have two active affiliations (defined by this policy) at any given time. This limitation is intended to balance the time required to fulfill staff obligations to the Center with additional demands of external responsibilities. This limitation is not intended to apply to unpaid roles with public recognition, such as academic or journal publications.

(b) **Remuneration:** Staff may not accept remuneration from any organization, with the exception of approved affiliations (including, for example, part-time employment, consultancies, publication contracts, or teaching assignments). All activities relating to any approved affiliation must be performed during the staff member's personal time, and Center resources (e.g., computers, telephones, copiers, printers, stationery, or other staff members' time) may not be used in connection with the affiliation.

(c) **Prior Approval Required:** Prior to accepting an affiliation with any outside organization (other than enlistment with any regular or reserve arm of any branch of the military, including, but not limited to, the U.S. Army, Navy, Air Force, Marines, Coast Guard, National Guard or

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<sup>1</sup> In addition to Affiliations under this Conflict of Interest Policy, the Disclosure Statement also includes disclosures under the [Insider Trading Policy](#).

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any state or local equivalent)<sup>2</sup>, the staff member will complete the Affiliation Request Form (“Form”) for submission to her/his managing director and, if approved, then to the Center’s president for final approval. After approval by the employee’s managing director (or vice president, if the staff member reports to a vice president), the Form should be sent via e-mail to [COI@pewresearch.org](mailto:COI@pewresearch.org) (with a copy to the staff member’s vice president) for review by Legal Affairs. Legal Affairs will then submit the Form to the president, who will approve or disapprove the requested affiliation in writing.

If the staff member seeking approval is a vice president, no approvals are required prior to sending the Form via e-mail to [COI@pewresearch.org](mailto:COI@pewresearch.org) for review by Legal Affairs and submission to the president. The president will approve or disapprove the requested affiliation in writing.

The board chairman will be responsible for approving the president’s affiliations, and Legal Affairs will facilitate the approval process.

Affiliations will likely be approved if: (i) they will not interfere with the timely fulfillment of the staff member’s responsibilities to the Center, taking into account all her/his duties, such as travel, that extend beyond normal working hours; (ii) the staff member is not on a formal performance improvement plan; (iii) the arrangement will not affect, or appear to affect, the staff member’s judgment on the Center’s behalf; and (iv) the outside organization is not engaged in any activity that may reasonably harm the Center’s reputation.

Once an affiliation is approved, the approved Form will be sent to Human Resources for placement in the staff member’s personnel file and copies will be sent to Legal Affairs, the staff member and the staff member’s vice president. If the affiliation is not approved, the employee will be notified.

Affiliations undertaken before employment with the Center are disclosed prior to the time of hire and are reviewed by Human Resources and Legal Affairs at that time for potential conflicts of interest. The Center may ask that staff members discontinue any affiliation(s) that create a real or perceived conflict of interest or might reasonably harm the Center’s reputation.

**(d) Campaign and Government Office Policy:** During a staff member’s employment with the Center, she/he may **not** accept a formal position (paid or unpaid) with any campaign for public office; (ii) serve on government transition teams; or (iii) run for or serve in a public office.

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<sup>2</sup> Staff who elect to enlist in a branch of the armed forces are not required to obtain prior approval, but must disclose the new affiliation at the time of enlistment.

Staff should also refer to the [Political Activity Policy](#) for guidance regarding political activities that may create a real or perceived conflict of interest for the Center.

**7. RECUSAL**

Staff may not participate in reviews, deliberations, actions or decisions taken by the Center with respect to an outside organization with which the staff member or her/his immediate family member (i) has any affiliation, (ii) has begun any discussions about future job possibilities or (iii) is otherwise unable to act in an impartial manner.

Staff may not participate in deliberations, actions, decisions, or the selection process that result in the employment of a candidate, or the purchase of goods or services from any organization in which the staff member or an immediate family member has a direct financial interest or with which one of them is affiliated.

When a staff member and/or her/his immediate family member undertakes an affiliation with an outside organization, she/he must make the organization aware that she/he must have no involvement in any activities undertaken by the organization related to the Center. Further, the staff member may not participate in any reviews, deliberations, actions, or decisions taken by the Center in connection with the organization.

**8. NO REIMBURSEMENT OF EXPENSES**

In general, staff are responsible for any expenses related to a personal affiliation (outside of their work for the Center) and the Center will not pay for or reimburse any such expenses.

Please note that this policy does not apply to expenses incurred in connection with Center work (e.g., conferences, professional membership dues or travel in connection therewith).

**9. QUESTIONS**

Staff members who have questions regarding the application, interpretation or compliance with this policy should send an e-mail to [COI@pewresearch.org](mailto:COI@pewresearch.org) for review and response by Legal Affairs.