



# Conflict of Interest Policy

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## Article I: Purpose

The purpose of this Conflict of Interest Policy (the “Policy”) is to foster member and public confidence in the integrity of the INTERNATIONAL ASSOCIATION OF CRIME ANALYSTS, INC. (the “Organization”) and to protect the Organization’s *Financial Interest* (defined below) when it is contemplating entering into a *Transaction* (defined below) that might benefit the private interest of an *Insider* (defined below) or might result in a possible excess benefit transaction. The Organization prohibits Insiders from using their position with the Organization for private gain or to obtain the benefits for themselves or members of their family, or anyone else. This Policy is designed to supplement, but not replace, any applicable state and federal laws governing conflicts of interest applicable to nonprofit and charitable organizations.

## Article II: Definitions

1. A **Conflict of Interest** is present when:
  - a. An Insider’s stake in the Transaction is such that it reduces the likelihood that an Insider’s influence can be exercised impartially in the best interests of the Organization. And/or,
  - b. An Insider’s outside interests interfere with the Organization’s interests or the Insider’s Organization-related duties and obligations.
2. **Transaction** means any business deal, agreement, contract, relationship, or arrangement between an Insider and the Organization, or between the Organization and any third party where an Insider has an interest in the Transaction or any party to it. Transaction specifically includes an Insider’s appointment or election to the IACA Executive Board, a committee, or any selected member officially representing IACA with any level of Executive Board delegated powers.
3. **Insiders** for the purposes of this Policy are:
  - a. Each member of the IACA Executive Board; The *President, Vice President of Administration, Vice President of Membership, Secretary, and Treasurer.*
  - b. All volunteers serving on active IACA committees, standing or special, and any other member volunteers who represent IACA in an official capacity at the behest of the IACA Executive Board or a committee chairperson.
  - c. Any *employee*, meaning an employee who receives monetary compensation from the Organization **and** who:

- i. Has responsibilities or influence over the Organization similar to that of officers, directors, or trustees; **or**
  - ii. Manages a program that represents 10% or more of the activities, assets, income, or expenses of the Organization; **or**
  - iii. Has or shares authority to control 10% or more of the Organization's capital expenditures, operating budget, or compensation for employees.
- 4. An **Interested Person** for the purposes of this Policy is an Insider or other person with a Financial Interest in a proposed Transaction.
- 5. **Ethics Committee** is the body of appointed members by the IACA Executive Board, charged with reviewing all complaints regarding professional and/or ethical misconduct by members or complaints of Conflict of Interest brought to them by the Executive Board or any member(s) in good standing.
- 6. **Financial Interest** means any commitment, investment, relationship, obligation, or involvement, financial or otherwise, direct or indirect, that may influence a person's judgment, including receipt of compensation from the Organization, a sale, loan, or exchange transaction with the Organization.

### Article III: Procedures

#### 1. Duty to Disclose

In connection with any actual or possible Conflict of Interest, an Interested Person must disclose the existence of Financial Interest and be given the opportunity to disclose all material facts to the IACA Executive Board and/or members of committees with governing board delegated powers considering the proposed Transaction.

#### 2. Determining Whether a Conflict of Interest Exists

After disclosure of the Financial Interest and all material facts, and after any discussion with the Interested Person, he/she shall leave the governing body or committee meeting while the determination of a Conflict of Interest is discussed and voted upon. The governing board or committee members shall decide if a Conflict of Interest exists.

#### 3. Procedures for Addressing a Conflict of Interest

- a. An Interested Person may make a presentation at the governing body or committee meeting and the governing body or committee may ask questions of the Interested

- Person, but after the presentation, the Interested Person shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible Conflict of Interest.
- b. With regard to an Insider, the Ethics Committee shall determine if a Conflict of Interest exists. The Ethics Committee shall ascertain that all material facts regarding the Transaction and the Insider's Conflict of Interest have been disclosed and shall compile appropriate data, such as comparability studies, to determine fair market value for the Transaction.
  - c. The chairperson of the governing body or committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed Transaction.
  - d. After reviewing the findings of the Ethics Committee and exercising due diligence which may include investigating alternatives that present no conflict, the IACA Executive Board shall determine whether the Transaction is in the Organization's best interest, for its own benefit, and whether it is fair and reasonable to the Organization; the majority of disinterested members of the Board then in office may approve the Transaction.

## **Article IV: Records of Proceedings**

The minutes of any meeting of the Ethics Committee and IACA Executive Board, pursuant to this Policy, shall contain:

1. The name of each Insider who disclosed or was otherwise determined to have an interest in a Transaction.
2. The nature of the interest and whether it was determined to constitute a Conflict of Interest.
3. Any alternative transactions considered.
4. The members of the Ethics Committee or IACA Executive Board who were present during the deliberations on the Transaction, those who voted on it, and to what extent Interested Person(s) were excluded from the deliberations.
5. Any comparability data or other information obtained and relied upon by the Ethics Committee and how the information was obtained; and

6. The result of the vote, including, if applicable, the terms of the Transaction that was approved and the date it was approved.

## **Article V: Voting Restrictions**

A voting member of the governing board who receives compensation, directly or indirectly, from the Organization for services is precluded from voting on matters pertaining to compensation.

## **Article VI: Annual Disclosure and Compliance Statements**

Each IACA Executive Board member, committee volunteers, appointed members acting in an official capacity at the behest of a board or committee chairperson, and trainers/presenters shall annually sign a statement which affirms such a person:

1. Has received a copy of the Conflict of Interest Policy.
2. Has read and understands all sections of the Policy.
3. Has agreed to comply with all sections of the Policy.
4. Discloses the person's Financial Interests and family or close relationships that could give rise to a Conflict of Interest.
5. Understands the Organization is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

## **Article VII: Violations**

1. If the IACA Executive Board has reasonable cause to believe that an Insider of the Organization has failed to disclose actual or possible Conflicts of Interest, including those arising from a Transaction with a related Interested Person, it shall inform such Insider of the basis for this belief and afford the Insider an opportunity to explain the alleged failure to disclose.
2. If, after hearing the Insider's response and making further investigation as warranted by the circumstances, the IACA Executive Board determines that the Insider has purposely failed to disclose an actual or possible Conflict of Interest, the Board shall take appropriate action by reporting the conflict to the Ethics Committee Chairperson.

## **Article VIII: Annual Reviews**

To ensure that the Organization operates in a manner consistent with its status as an organization exempt from federal income tax, the IACA Secretary and IACA Treasurer, in conjunction with the IACA Webmaster, shall oversee an annual review of the administration of this Conflict of Interest Policy. The review may be written or oral. The review shall consider the level of compliance with the Policy, the continuing suitability of the Policy, and whether the Policy should be modified and improved.

## **Article IX: Use of Outside Experts**

When conducting the annual reviews as provided for in Article VIII, the Organization may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the governing board of its responsibility for ensuring periodic reviews are conducted.

## Appendix: Acknowledgments and Financial Interest Disclosure Statement

International Association of Crime Analysts, Inc. (the “Organization”) follows a Conflict of Interest Policy designed to foster public confidence in our integrity and to protect our interest when we are contemplating entering a transaction or arrangement that might benefit the private interest of an executive board member, committee volunteer, member acting in an official capacity at the behest of a board member or committee chairperson, or a paid trainer/presenter.

### Part I. Acknowledgment of Receipt

I hereby acknowledge that I have received a copy of the Conflict of Interest Policy of the Organization, have read and understood it, and agree to comply with its terms.

X

\_\_\_\_\_  
Signature of IACA Insider



**Part II. Disclosure of Financial Interests**

We are required annually to file Form 990 with the Internal Revenue Service, and the form we file is available to the public. To complete Form 990 fully and accurately, we need each officer, committee volunteer, member acting in an official capacity at the behest of a board member or chairperson, or paid trainer/presenter to disclose the information requested in Part II.

A “conflict of interest,” for purposes of Form 990, arises when a person in a position of authority over an organization may benefit financially from a decision he or she could make in such capacity, including indirect benefits such as to family members or businesses with which the person is closely associated.

**Part II: Disclosure of interests and relationships:**

I hereby disclose my interests and relationships that could give rise to a conflict of interest.

[Complete the table below. Use additional pages as needed.]

Type of Relationship	Names of those presenting a potential conflict of interest
Relationships could include family members (immediate or extended), affiliated companies or nonprofits, or close business associates.	
Type of interest	Description of interest that could lead to a conflict of interest
Transactions or arrangements with the Organization	
Transactions or affiliations with other nonprofit organizations	
Substantial business or investment holdings	
Transactions or affiliations with businesses not listed above	

I am not aware of any financial interests involving me, a family member, an organization or business associate that could present any of the types of conflict of interest listed above.

X

\_\_\_\_\_  
Signature of IACA Insider

### Part III. IACA Insider Standards of Professional Conduct

The IACA Insider Standards of Professional Conduct are set forth for the protection of IACA and its members. Insiders are the core of IACA operations and work together to provide the best service and experience possible for the entire IACA membership. Insider loyalty and dedication towards furthering the reputation and integrity of IACA are of the utmost importance.

**Insider Evaluation:** Your performance will be evaluated throughout your term of service with IACA. Depending on the extent and complexity of your tasks, evaluations may be informal, and it is important that you communicate clearly and frequently with committee and/or executive board members. You are encouraged to share any successes, difficulties, suggestions, and questions that may arise while performing your assigned IACA duties.

**Insider Standards:** The principles listed below were created to serve as a framework to follow while serving for the IACA:

1. **Be inclusive.** We welcome and support people of all backgrounds and identities. This includes, but is not limited, to members of any sexual orientation, gender identity and expression, race, ethnicity, culture, national origin, social and economic class, educational level, color, immigration status, age, size, family status, political belief, religion, and mental and physical ability.
2. **Be considerate.** We all depend on each other to produce the best work we can as a non-profit organization. Your actions will affect members, partners, and colleagues, and you should take those consequences into account when making decisions. Maintaining consistent and timely communication with board members, chairpersons, and members will ensure that operations continue to run smoothly.
3. **Be respectful.** We won't all agree all the time, but disagreement is no excuse for disrespectful behavior. We will all experience frustration from time to time, but we cannot allow that frustration to become personal attacks. An environment where people feel uncomfortable or threatened is not a productive or creative one.
4. **Choose your actions carefully.** Always conduct yourself professionally. Be kind to others and do not engage in dishonest behaviors.
5. **Adhere to all current IACA policies and procedures.** This includes, but is not limited to, Conflict of Interest and Professional Standards Policy (all parts), assigned committee charter(s), Forum Terms of Use, Social Media Policy and Membership Code of Conduct. Current versions can be found on the [Policies page](#).

X

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Signature of IACA Insider

## Part IV. Data Privacy Notice

As IACA Insiders, you may have access to personal information belonging to our members.

We all have a duty to safeguard the privacy and confidentiality of personal membership data. Inevitably, there are a number of legitimate and permitted purposes for processing membership data, e.g. through membership registration, training applications, conference registration, certification applications, etc., and our [Privacy Policy](#) outlines these in full. We must also adhere to the various Data Protection laws that exist globally such as the General Data Protection Regulation (GDPR) in Europe and Canada's Protection of Personal Information and Electronic Documents Act (PIPEDA). Even as a US-based organization, the fact that IACA processes data belonging to members outside of the US, means these laws still apply.

IACA has implemented a number of systems and processes to ensure that as an organization, we adhere to these laws. In particular, members are required to 'opt-in' to receiving communications from IACA. It is therefore imperative that we, as IACA Insiders, only communicate with members in accordance with their preferences and subscriptions.

***IMPORTANT: Please ensure you carefully read and understand our Privacy Policy, familiarize yourself with the legal grounds for processing personal data and ensure you only process membership personal data for the purposes listed.***

Additionally, personal data belonging to IACA members should only be stored on the Insider's computer for the minimum amount of time necessary for the permitted purpose. Therefore, once a month, please ensure you:

1. Identify any saved documents which contain IACA members' personal data and, if no longer in use for a permitted purpose, please fully delete these files. Please feel free to contact [iacavpmembership@iaca.net](mailto:iacavpmembership@iaca.net) if you are unsure whether you are retaining/using the data for a permitted purpose or not.
2. Notify [iacavpmembership@iaca.net](mailto:iacavpmembership@iaca.net) if anyone asks you for any IACA members' personal data.

If you have any questions about this Data Privacy Notice or IACA's [Privacy Policy](#), please contact [iacavpmembership@iaca.net](mailto:iacavpmembership@iaca.net).

X

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Signature of IACA Insider