

University Policy 200:21 CONFLICT OF INTEREST

Responsible Administrators: Vice President of Administration/Provost

Responsible Office: Office of Human Resources

Originally Issued: August 2006

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Authority: Office of the President

Policy Statement

It is the policy of Claflin University to promote a work environment of honesty, loyalty, high moral standards, and exemplary work ethics. The University's objective is to foster a professional work and learning environment by educating employees concerning Conflict of Interest and how it affects employment, community relations, and the reputation of the University. This policy will set the guidelines for the recognition and prevention of a conflict of interest.

Statement of Purpose

This policy establishes guidelines to protect the integrity and rights of the University. It recognizes the significance of interactions and supports and encourages employee's participation in research, publications, external organizations, community activities, collaboration with other institutions, and professional and personal endeavors. Employees are expected to perform their duties and conduct business in an appropriate manner, with academic integrity, and in the best interest of the University by demonstrating at all times their commitment to the highest intellectual and ethical standards.

Applicability

This policy is applicable to all administrators, faculty, and staff employees. Adjunct faculty members and hourly employees may be required to complete a Conflict of Interest form.

INTERNAL CONTROLS

Claflin University management has implemented specific and general measures to control perceived and/or actual conflicts of interest. These measures are detailed below.

Procedures

The University prohibits employees from engaging in any conduct that constitutes a conflict of interest. The following actions are considered a conflict of interest and are prohibited:

- ✓ Acceptance of gifts, monetary or non-monetary, favors, gratuities, or rewards for services an employee performs in connection with University employment.
- ✓ Offer or acceptance of any money or valuables in exchange for employment selection, promotion, or special privilege or benefit.
- ✓ Campaigning during working hours for self or someone else.
- ✓ Soliciting an employee to contribute to political purposes.
- ✓ Accepting any work or compensation that could be reasonably construed as a conflict of interest without proper prior approval.
- ✓ Engaging in any practice that is a conflict of interest.
- ✓ Participation in professional activities that constitutes a conflict of interest.
- ✓ Exercising inappropriate administrative authority to influence subordinates or others in such a way that it may adversely affect the University's interest.

Disclosure

Employees will be required to complete a Disclosure Form. The information on the form will ascertain if a conflict of interest exist based upon the employees' activities. Disclosure will not prevent the employee from maintaining the disclosed circumstance if it does not create a conflict of interest. The following information must be disclosed:

- ✓ Any relationship that an employee has with a third party who does business with the University in which the employee receives remuneration.
- ✓ A direct business relationship between the employee and the University Textbooks or other course materials that the employee has authored or co-

authored and students are required to use them for classes being taught by the employee, see the University Textbook Approval Policy - 300.03.

- ✓ Any intellectual property (patents, trademarks, licensing agreements, etc.) contractually obligated to the employee or the university in which the employee is the author or owner.

Disclosure Form

Employees are responsible for disclosing their participation in activities, circumstances, and business or financial relationships. Because of the necessity to avoid conflicts of interest and the appearance thereof, this policy requires employees to disclose certain financial data and other requested information. The appropriate personnel (the Provost, appropriate Vice President or designee, and Director of Human Resources) will review the Employee Disclosure Form and make recommendations to the President. Items of concern will be evaluated to determine if they presently constitute a conflict of interest or could potentially create a conflict of interest.

The information included on the form must be accurate. Refusal to complete the Disclosure Form or providing false, misleading, incorrect, or incomplete information is a violation of this policy and employees will be disciplined in accordance with applicable University policies.

EMPLOYEE RESPONSIBILITY

All employees are expected to commit to the highest standards of professionalism. Employees uncertain about any work, committee or organizational assignment, compensation, or other circumstance that could be real or perceived conflicts of interest should refer their questions to the Provost, the appropriate Vice President, or contact the Office of Human Resources for directions.

After initial signing of a disclosure statement by an employee, the employee is responsible for informing the Director of Human Resources of situations which may present a conflict of interest and completing another Disclosure Form which includes those situations. The employee is solely responsible for the disclosure of such situations.

Finally, before an employee pursues or engages in future business or financial activity, it is strongly recommended that the employee discuss the activity with the appropriate supervisor to ensure that the activity does not present a conflict of interest. Engagement in an activity that is found to be a conflict of interest may be grounds for disciplinary action.

UNIVERSITY RESPONSIBILITY

The University reserves the right to apply disciplinary action, including termination, for violation of this policy.

OTHER RELATED POLICY

Nepotism

