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2.2 Conflicts of Interest Policy

Saint Mary's College of California

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2.2 Conflicts of Interest Policy

Faculty and staff, as employees of Saint Mary’s College, occupy a position of trust and responsibility as members of the College community. Therefore the College and its employees have obligations to students, parents, donors and others to use College resources responsibly and for designated business purposes. In meeting its mission, values and other obligations as a non-profit institution of higher education, the College expects all of its employees to carry out their responsibilities with the highest level of integrity and ethical behavior, and without conflicts of interest.

2.2.1 Potential Conflicts of Interest

Employees of the College are expected to perform their work-related and professional duties in the best interests of the College, to the extent permitted by law. While performing these duties,

an employee must not put the interests of any individual, agency, organization, or association above the best interests of the College. This means, among other things, that an employee is not to engage in any activity or transaction that could influence or cause them not to act in the best interests of the College, including, without limitation, any personal business transaction or private arrangement for personal profit which arises out of or relates to a position of authority with the college or is available because of the confidential information obtained by reason of such position of authority. For purposes of this policy, “personal” means the employee, any member of his or her immediate family (spouse, parents, children, siblings, domestic partners) and any entity with which he or she may be associated.

2.2.2 Disclosure Responsibility

Employees must disclose to the President in writing, at the time a conflict is identified or develops, any financial, ownership or management interest in any entity engaged either in the delivery of educational services, or in the delivery of goods or services of any kind to the College. Employees with questions about the applicability of this Policy in a given situation are encouraged to contact the Provost, Vice President for Finance or Assistant Vice President of Human Resources or designee. Examples of potential conflicts of interests and forms for disclosing potential conflicts of interests are available from the Assistant Vice President of Human Resources or designee.

2.2.3 Outside Employment

Employees must refrain from participation in a transaction or effort that could result in personal profit, except upon the written prior approval of the President. This prohibition includes, but is not limited to, work outside the College, regardless of the level of compensation to the employee, that is determined to interfere with the employee’s work-related and/or professional responsibilities of the College. While the College does not prohibit staff from holding outside employment, such employment must not create a conflict of interest with the College or interfere with the person’s employment responsibilities to the College. Such determination shall be made by the President, in consultation with the employee’s immediate supervisor, Provost and/or area Vice President and/or Vice Provost, and the Assistant Vice President of Human Resources or designee.

2.2.4 Gifts, Favors, Service, Compensation or Benefit

An employee may not accept any gift, favor, service, compensation, or benefit of any kind from any person or entity who can influence the exercise of the employee’s professional judgment to act in the best interests of the College, consistent with the person’s obligations as an employee of the College. Items of minimal value (defined as having a value of \$100 or less) are not included within the Policy. Likewise, financial inducements and rewards that flow from a person’s work-related duties and professional obligations as an employee of the College and as a member of the Saint Mary’s community, including but not limited to grants, travel money, honoraria, that may result in conflicts of interest must be disclosed to the employee’s direct supervisor prior to being pursued, received and/or accepted.

2.2.5 Reporting Relationships

Members of the same family may not be employed in a situation where one member of the family works under the administrative supervision of another, nor may one participate in any employment, salary, or other important decision regarding an immediate family member or person with whom the employee is in an amorous relationship (see College’s Amorous Relationships Policy). For purposes of this policy, “family member” includes the employee, any member of his or her immediate family (spouse, registered domestic partner, parents, children, siblings). Any exceptions to this requirement must be reviewed with the Assistant Vice President of Human Resources or designee, and approved by the appropriate area Vice President or the Provost.

2.2.6 Sanctions

Violations of the College’s Conflicts of Interest policy will result in appropriate disciplinary action up to and including suspension without pay, transfer, demotion, termination of employment, cessation or prohibition of business with a vendor, and/or other appropriate remedies. Employees with questions about the applicability of this Policy in a given situation should contact the Assistant Vice President of Human Resources or designee.