



Financial Administration Policy on Conflicts of Interest and Commitment

Financial Administration (“FAD”) staff members have important responsibilities, including fiduciary duties, to the University and are often privy to confidential or non-public information about the University. In meeting FAD goals and obligations, all FAD staff should perform their jobs in a manner that will ensure that there is no conflict, or any appearance of conflict, between their personal interests and those of the University. Any real or potential conflict must be disclosed in advance to the staff member’s supervisor or department head. Failure to disclose possible conflicts or refusal to cease activities that are determined to be in conflict with the University’s best interests may be grounds for disciplinary action and may lead to termination. This policy covers both conflicts of interest and commitment. A description of the policy and examples of each are set forth below.

Conflict of Interest

A conflict of interest may arise when a FAD staff member’s commitment to the University may be compromised by personal benefit. For example, FAD staff should avoid situations or activities in which the staff member has an existing or potential financial or other interest that impairs or might impair his or her independence of judgment in fulfilling his or her responsibilities to the University. FAD staff should also avoid situations or activities that provide a financial or other benefit from the use of non-public information pertaining to the University.

Relationships with Third Parties

In the course of performing job responsibilities for the University, FAD staff members often come in contact with third parties, including vendors of goods and services. FAD staff members must avoid situations where they personally benefit from the relationship. Generally, FAD staff members should not accept gifts from third parties that do business or seek to do business with the University, or that seek other forms of association or benefits from the University. However, FAD staff may accept gifts if they do not exceed \$75 in value or are part of a broad-based promotion on the part of the giver. In all circumstances, prior to accepting a gift, FAD staff members must disclose and discuss the matter with their supervisor or department head.

Conflict of Commitment

A conflict of commitment may arise when a FAD staff member undertakes an outside activity that interferes with his or her primary obligations and commitment to the University. Outside activities, such as consulting work that primarily benefits the FAD staff member are to be performed on the staff member’s personal time. In addition, it is not permissible to use University property or other resources, such as office equipment, supplies, or support staff, in the course of performing the outside activity. This policy is not intended to limit reasonable participation in professional and community activities that benefit and reflect positively on the University as long as they have been disclosed to and discussed with the staff member’s supervisor or department head.



Examples: Financial Administration Conflicts of Interest and Commitment

These examples apply to all FAD employees, including exempt and non-exempt personnel.

Example 1

Several FAD staff members are working off-site with a consultant to establish and implement a major system and database for the University. The project has gone on for almost a year. Recently, the consultant has asked the FAD staff members to attend a Red Sox season playoff game.

Prior to accepting the baseball tickets, the FAD staff members should report the offer to their supervisor or department head.

Example 2

A FAD staff member holds a University Purchasing Card for her department. Every week the staff member places a department order for food at a local specialty shop. In December when the shop makes its weekly delivery, they leave a large food basket, filled with delicacies, for the staff member for her patronage throughout the year.

The staff member should disclose the gift to her supervisor or department head.

Example 3

A FAD staff member's son plays on an ice hockey league. The staff member is leading the league's fundraising event, a silent auction. The staff member has three weeks to obtain sponsors for the silent auction, which will require making numerous phone calls during business hours.

Prior to undertaking the activity, the staff member should discuss the time commitment with her supervisor or department head.



Financial Administration Attestation for Conflict of Interest and Commitment

I, _____, have read and understand Financial Administration's Staff Conflicts of Interest and Commitment Policy. By signing below, I acknowledge that I am in full compliance with the Policy and agree that as situations arise I will discuss them in advance with my Department Head.

(Print Name)

(Signature)

(Date)