



SNU Policy: Conflict of Interest

SNU Policy ID: General Information A-9

Policy Reviewed by: Director of Human Resources

Approval Authority: Vice President for Business and Finance

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A. Purpose

To provide guidelines for preventing conflicts of interest in the workplace.

B. Policy

Southern Nazarene University depends upon the integrity and discretion of its faculty and staff with respect to actual or apparent conflicts of interest. Employees should always act in the best interest of the University and not permit outside interests to interfere with their job duties.

C. General

A conflict of interest occurs when an employee uses their University employment to obtain unauthorized privileges, benefits, or things of value for oneself or others. "Things of value" includes money, gifts, favors, discounts, employment opportunities, travel, entertainment, or other tangible or intangible benefits. A conflict also may exist when an employee's personal, family, financial, or other interests could compromise, or reasonably appear to compromise, the employee's objectivity, judgment, or ability to act in the University's best interests.

Employees shall avoid the following conflicts of interest and must disclose any actual, potential, or apparent conflict before participating in the matter:

1. No employee shall solicit, accept, or agree to accept any privilege, benefit (financial or otherwise) or thing of value for the exercise of his or her discretion, influence or powers in their duties as a SNU employee except as allowed by policy.
2. No employee shall accept any privilege, benefit or thing of value that might influence him or her in the discharge of his or her duties as an employee.
3. No employee shall use his or her position to secure special privileges or exemptions for himself or herself or others, except as allowed by policy.
4. Any employee who is an officer, agent, employee or member of, or owns an interest in any entity doing business with the University must disclose such relationship in writing to his or her immediate superior and divisional vice president.
5. No employee shall engage in any personal, business or professional activity which foreseeably might require or induce disclosure of confidential information acquired by reason of his or her University position.



6. No employee shall disclose confidential information gained by reason of his or her position, nor shall he or she otherwise use such information for his or her personal gain or benefit.
7. No employee shall transact any business for the University with any entity of which he or she is an officer, agent, employee, or member, or in which he or she or any immediate family member owns an interest or can financially benefit from the transacted business without disclosing such relationship in writing to his or her immediate supervisor and divisional vice president.
8. No employee shall make personal investments in any enterprise which foreseeably might create a substantial conflict between his or her private interests and the University's interests.
9. No employee shall exercise his or her official authority in a manner that might foreseeably create a substantial conflict between his or her private interests and the University's interests.
10. While employed by the University, no employee shall accept other employment which might impair his or her independence or judgment in the performance of his or her duties. Employees must comply with any applicable University policy requiring advance disclosure or approval of outside employment or professional activities.
12. No employee who exercises discretion in connection with contracts, purchases, payments, claims or other pecuniary transactions shall solicit, accept or agree to accept any benefit (financial or otherwise) from a person or entity the employee knows, or should know, is or is likely to become financially interested in such transactions. Such transactions would include faculty using their own publications or text books for students to purchase and use for the classroom. Before requiring students to purchase materials from which the faculty member or an immediate family member may receive a financial benefit, the faculty member must disclose the interest in writing and obtain written approval from the University.
13. No employee shall utilize his or her position to gain privilege or things of value for family members related by consanguinity and/or affinity.

If you become aware of any potential conflict of interest, you must promptly disclose it to your immediate supervisor and divisional vice president as soon as possible. The immediate supervisor and divisional vice president, in consultation with the Director of Human Resources and other appropriate University officials, will determine whether a conflict exists and what action should be taken.

D. Consensual Relationships

A consensual relationship is a romantic or other relationship that may create an actual or the appearance of a conflict of interest, yet is agreeable and welcomed by both parties. Such relationships between supervisors and subordinates; instructors and students; and advisors and students reasonably may influence the discharge of the supervisor,



instructor, or advisor's duties by:

1. Dividing the supervisor, instructor, or advisor's loyalties;
2. Providing the opportunity to use his or her position to secure relational favors and advantages from his or her subordinates or students; and/or,
3. Inducing him or her to disclose confidential information gained by reason of his or her position.

For these reasons, such relationships are strongly discouraged. Should such a relationship develop, the supervisor, instructor, or advisor shall promptly disclose to his or her immediate supervisor that a conflict of interest may exist between the parties and cooperate in making alternative arrangements for the supervision, evaluation, teaching, grading, or advising of the employee, student, and/or student employee. The person with greater institutional authority must make the disclosure and must not exercise authority over the other person while alternative arrangements are being considered or implemented, except as expressly authorized in writing.

The University may require the individuals to acknowledge in writing that the relationship is voluntary and free from coercion and harassment. The University will determine the appropriate measures to eliminate or manage the conflict based on the circumstances. Such measures may include removing supervisory, instructional, evaluative, advisory, or other decision-making authority; modifying reporting relationships or job responsibilities; transferring or reassigning one of the individuals; or taking other appropriate action.

The supervisor, instructor, or advisor disclosing the conflict is not required to explain the nature of the conflict only that a conflict of interest exists which must be remedied. Examples include, but are not limited to:

- A supervisor dating an employee within his or her line of authority,
- A faculty member developing a close and intimate relationship with a student currently enrolled in his or her class,
- An advisor becoming romantically involved with a student he or she is advising, or
- A faculty evaluator reviewing the dissertation of a student who is a relative or close family friend.

Failure of an employee to comply with the foregoing shall constitute grounds for disciplinary action, up to and including termination of employment. The University prohibits retaliation against any individual who makes a good-faith disclosure or reports concerns pursuant to this policy. Employees who are unsure whether an interest creates a conflict should contact the Director of Human Resources for guidance.

Nothing herein shall be construed in derogation of the University employment-at-will policy.