
Conflict of Interest Policy

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Effective:

Last Updated: August 1, 2021 (format only)

Responsible University Office: Human Resources

Policy Contact: Director Human Resources, Client Services

Notice:

Effective August 1, 2021 this policy was converted into an easily accessible standalone PDF document. This policy still remains in Part II of the Policies and Procedures Manual and no changes were made to this policy when it was converted to the standalone PDF document.

Policy

The highest standards of conduct and honesty are expected of all employees of Gonzaga University. It is the obligation of all employees to avoid involvement in activities which might conflict, or which might appear to conflict, with institutional responsibilities. The conflict of interest guidelines contained in this document are intended to help employees avoid involvement in actual or apparent conflicts of interest, and to protect both the employee and Gonzaga from potential legal prosecution, damage to its reputation and financial loss.

While it is useful to provide basic guidelines to assist employees in assessing potential conflict situations, no list can be so exhaustive as to provide direction for all the variable circumstances that may arise. The personal good judgment of employees is indispensable.

Gonzaga remains committed to academic freedom and nothing in this policy should be construed as diminishing this commitment.

A. Definition

A conflict of interest is considered to exist if an employee's actions or activities on behalf of Gonzaga result in preferential treatment or an improper gain or advantage to the employee, the individual's family or business associates, or conversely, has a detrimental effect on Gonzaga's interests. It can include an instance in which an employee fails to exercise due care, skill, and

judgment on behalf of Gonzaga in the performance of the individual's duties because of a conflict of interest.

B. Guidelines

1. All employees have a duty to act in the best interests of Gonzaga. Therefore, all employees have a duty to avoid conflicts of interest and to conduct themselves in a manner that maintains the integrity and accountability of Gonzaga University.
2. Employees who have a financial or family interest in a business that furnishes goods or services or contracts with Gonzaga should not undertake to act for Gonzaga or enter into negotiations or contracts with that business, either directly or indirectly, on behalf of Gonzaga University. No employee may participate in the selection, award or administration of a contract with any party with whom he or she is negotiating potential employment, or has any arrangement concerning potential employment.
3. Employees must avoid outside employment or business activity which may conflict, or appear to conflict, with Gonzaga interests. Directorships or consultation agreements for which the employee is compensated must be approved in writing by the appropriate dean or area vice president.
4. Employees must provide full written disclosure of any business, financial enterprise or activity that might influence, or appear to influence, decisions or actions concerning Gonzaga matters. Disclosure must be made by completing a disclosure statement annually, or whenever a significant change in interest occurs. The disclosure statement will be maintained in a confidential file by the appropriate area vice president and a copy submitted to General Counsel.
5. If an employee anticipates a conflict of interest or that the appearance of a conflict may arise, he or she should seek advice from the appropriate dean or area vice president. Employees should not participate in any way in the matter that is the subject of their concern until the area vice president has made a determination regarding the potential conflict of interest. Such determination will be in writing.
6. Employees should not use confidential information or special knowledge acquired as a result of their relationship with Gonzaga to, among other things, purchase or sell securities, real property or other goods or services, or to in any way enhance their own personal financial well-being by using such inside information to their own advantage.
7. Employees may use the name of Gonzaga to identify themselves professionally, but unless they are authorized to do so, they should be careful not to represent themselves as speaking on behalf of Gonzaga University.
8. Employees may not use students or other employees of Gonzaga to perform personal services for themselves or others if improper gain or benefit would result, or to perform any tasks unrelated to their position description.

9. Employees must not disclose information regarding Gonzaga's intentions as to investments, property development, sale or acquisition of property, or Gonzaga's purchasing and contracting activities.
10. Employees must not make unauthorized use of Gonzaga equipment, property or other resources for personal benefit or for the personal benefit of any other person.
11. Personal gifts or favors from persons with whom Gonzaga has a business relationship should be discouraged. To avoid improper influence, or the appearance or suggestion of such, personal gifts of more than nominal value should not be accepted. Special caution has to be exercised by employees involved in awarding or administering federal or government contracts as it is a crime to solicit or accept gratuities, favors or anything of value from contractors or potential contractors.
12. Employees may not be involved in Gonzaga matters pertaining to a member of his or her immediate family, insofar as said matter affects such family member's employment, evaluation or advancement at Gonzaga, without first making a full disclosure. Such disclosure must be in writing and shall include the nature of the relationship and the impact or potential impact the employee's actions may have on such family member. The disclosure should be made prior to any action being taken with regard to the family member and should be made to the appropriate area vice president. See also **Part 2: Certain Relationships by Persons in Authority Policy**.