5.2.1 Conflict of Interest

Policy Section: Conditions of Employment
Policy Number and Title: 5.2.1 Conflict of Interest
Applicable to: All Regular Employees
Effective Date: December 12, 2017
Responsible Executive: Lianne Sullivan-Crowley
Responsible Office: Office of Human Resources
Contacts: hr@princeton.edu, 8-3300
Last Update: September 29, 2016

Policy Description

Employees of Princeton University who act on its behalf have an obligation to avoid activities or situations which may result in a conflict of interest or the appearance of conflict of interest as described by Princeton's various conflict of interest policies noted below. Employees must not use their Princeton University affiliations or positions to influence, directly or indirectly, outside organizations or individuals for the financial, personal or professional benefit of themselves, members of their families or others with whom there are personal relationships. In or outside of the workplace, supervisors must not (1) use their positions to influence their staffs to provide gifts, donations or contributions of any kind, (2) solicit their staffs for funding or other support for political candidates or campaigns, and/or (3) have a personal relationship within their reporting line.

Annually, all regular and term benefits-eligible staff members complete the Annual Disclosure and Certification Form at the start of the calendar year. Individuals are expected to disclose even if they are unsure of conflict situations, i.e., err on the affirmative side of disclosure. Individuals also have a continuing obligation to complete and submit a new Annual Disclosure and Certification Form at any time during the year as it pertains to conflict of interest or conflict of commitment when there is any actual or anticipated significant change in their outside activities or related financial interests.

Application of This Policy

The following policies provide guidance for avoiding conflict of interest.

- 2.1.5 Employment of Members of the Same Family or Household
- 5.2.2 Nepotism and Personal Relationships in the Workplace
- 5.2.3 Consulting and Other Outside Activities
- 5.2.4 Purchasing and Contracts
- 5.2.5. Use of University Resources
• 5.2.6 Gifts and Gratuities
• 5.2.7 Solicitation and Distribution

All employees have an affirmative obligation to examine carefully any situation where there is potential for conflict of interest or the appearance of conflict of interest. Failure to do so may result in disciplinary action.

Employees who are concerned that a conflict may exist or who are uncertain as to the impact or appearance of their activities should always consult with their supervisor or the Office of Human Resources prior to engaging in the activity.

If there is a potential conflict, the supervisor should decide how best to resolve the situation. If the employee disagrees with the supervisor's judgment or if the supervisor needs additional guidance, the relevant party or both parties should state the reasons for their concern and refer the situation to the department head.

If the situation warrants, the department head will refer the situation to the vice president for human resources for final determination.

Related Documents

Other Policies

Annual Disclosure and Certification Form
Conflict of Interest and Conflict of Commitment: Understanding Your Obligations
2.1.5 Employment of Members of the Same Family or Household
5.2.2 Nepotism and Personal Relationships in the Workplace
5.2.3 Consulting and Other Outside Activities
5.2.4 Purchasing and Contracts
5.2.5 Use of University Resources
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Update Log

December 14, 2015: Clarification of procedure.
September 29, 2016: Clarification of role of supervisors.
December 12, 2017: Clarification of annual disclosure process and expectations.

Contacts

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