

OFFICE OF COMPLIANCE SERVICES  
UVM.EDU/POLICIES

# POLICY

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Policies residing on UVM's Institutional Policy website are the most current versions available. If you are viewing a policy

Conflict of Interest (COI) when activities compromise, or appear to compromise, an employee's judgment in performing his or her University duties.

Covered Persons: refers to all faculty regardless of FTE and all exempt staff classified as a .5 FTE or greater.

Family: is, for the purposes of this policy, a spouse or civil union partner, member of same

As such, the Board of Trustees approves, supports and affirms this Policy. Changes to this Policy require approval by the President as well as by the Chair of the Board of Trustees.

## CONFLICTS OF INTEREST

Conflicts of Interest can arise when an employee, or a member of their Family has an existing or potential personal, financial or other interest that: (a) impairs or may reasonably appear to impair independence of judgment or their ability to perform their job duties/responsibilities to the University; or (b) may result in personal gain or advancement at the expense of the University. University employees serve the public trust and are required to fulfill their responsibilities with due care and loyalty to the best interests of the institution. The integrity of the University must be protected at all times, both in actuality and appearance. Conflicts of interest therefore must be: (1) disclosed, (2) eliminated or (3) properly managed.

Many outside activities in which an employee may wish to engage, such as certain outside employment,

This determination shall be communicated to the employee in writing within fourteen (14) calendar days after the employee makes disclosure. If additional review is warranted, the communication will include an estimated timeframe for which the employee will receive a determination. If the employee is not so informed within this time period, they are responsible to follow up with the reviewer in writing, prior to engaging in the proposed endeavor or activity.

If, after discussion of the proposal with the employee, the reviewer identifies an actual or possible conflict, the reviewer will:

- 1) Develop with the employee a conflicts management plan which shall be reduced to writing; or
- 2) In the case of an irreconcilable/unmanageable conflict, disallow the proposed activity. Employees whose disclosures result in disallowance of the proposed activity may grieve the decision under otherwise applicable grievance procedures.

### Reporting of Possible Policy Violations

Supervisors are required to investigate promptly possible violations of these policies. If a policy violation is proven, the supervisor must take appropriate responsive action, which may include disciplinary measures. Third parties may report possible violations of the conflict of interest policy to the employee's supervisor or to [UVM's Ethics and Compliance Reporting & Help \(the HelpLine\)](#). Persons making a good faith report are protected from retaliation under UVM's Whistleblower Policy.

### CONFLICT OF COMMITMENT

The primary work commitment of a full-time University employee is to their position at UVM. It is the responsibility of the employee to manage their external activities so that they do not interfere with their UVM obligations.

Any employees who wish to engage in professional activities outside of their university employment, regardless of whether those activities are compensated, including any form of external employment or independent consulting, must inform and then obtain permission from their supervisor in writing of the proposed activity before making the commitment.

All Covered Persons and such other officials as the Prl

part-time political office) are consistent with effective service as a University employee. Other kinds of political activity (e.g., intensive campaigning for elective office, or serving a term that requires full commitment either continuously or periodically) may require that the employee seek a leave of absence from the University. In recognition of the legitimacy and social importance of political activity by its employees, the University may require a leave of absence for employees who are serving in a political office or who are engaged in political activity that requires full commitment either continuously or periodically.



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University of Vermont Policies and Operating Procedures are subject to amendment. For the official, approved, and current version, please visit UVM's [Institutional Policies Website](#)



## ADDENDUM A

### PROHIBITED CONFLICTS OF INTEREST

- Making a decision to employ, promote, or terminate a member of the employee's family; or supervising, setting salary or wages, approving time cards or employment records.7 (d)3.1 (e)1 (h.1 (e)1 (h.1 6 (c)0. Tm 89tot (

- Serving as an executive officer or on the board of directors of a profit or non-profit entity, such as a corporation, association, or partnership, regardless of remuneration, that interacts with the University in