

Effective Date: **June 1, 2015**

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POLICY

EMPLOYMENT

Employee Handbook – Section 402

Conflict of Interest

RESPONSIBLE OFFICE

Human Resources

402 CONFLICT OF INTEREST

402.1 General Policy

Boston University employees covered by this Handbook are required to avoid ethical, legal, financial, or other conflicts of interest and to ensure that their activities and interests do not conflict with their obligations to the University or its welfare. A conflict of interest may exist if an employee or a member of the employee's immediate family has a financial interest that conflicts with the interests of the University.

An employee who encounters a personal interest that may have the potential of conflicting with the interests of the University is required to discuss immediately the matter with his or her supervisor. Supervisors are responsible for notifying the University's Office of General Counsel of conflict-of-interest situations.

Designated employees are required to comply with additional policies adopted by the Trustees

of Boston University.

402.2 Consulting, Outside Employment, and Financial Interests

Boston University employees covered by this Handbook may not engage in any outside consulting or employment that conflicts with the interests of the University. Employees are required to fulfill successfully the responsibilities of their position, and any external employment activity that results in neglect of the employee's job responsibilities is inappropriate.

Employees covered by this Handbook must obtain written approval from their Department Head to engage in any outside consulting activity or employment that may involve a conflict of interest. Boston University reserves the right to require employees to submit an external activity report covering any outside employment activity. Key employees may be required to disclose specific information on outside activities that may involve a conflict of interest.

402.3 Additional Employment with Boston University

Boston University employees will not be offered additional employment with the University without written approval of both the employee's Vice President or Provost and Human Resources. This policy applies to full- and part-time employees wishing to hold a second job with the University, including the teaching of University courses for additional compensation. Such cases have to be reviewed carefully to ensure compliance with the provisions of the Fair Labor Standards Act. For example, non-exempt employees cannot be regularly scheduled to work in excess of forty hours per week without prior authorization.

402.4 Solicitation and Acceptance of Personal Gifts

Boston University is committed to the highest standards of honesty, integrity, and fairness in both actuality and appearance. Consistent with this commitment, University employees and members of their immediate families are prohibited from soliciting any personal gift, gratuity, favor, service, or other benefit (collectively, a "gift") from individuals or companies seeking any advantageous action by, or relationship with, the University.

The acceptance of a personal gift, even if unsolicited, is also prohibited in most instances. A gift valued in excess of \$50 or of undetermined value, unless employed for a University

purpose or shared widely within the University or a unit thereof, must be declined or returned immediately. Multiple gifts from a single source in any calendar year are prohibited. Gifts of promotional items without significant value that are routinely distributed by vendors to clients, and courtesy copies of professional printed matter, may be accepted. However, employees are prohibited from accepting gifts of money or their equivalent, regardless of the amount, at any time.

Employees are prohibited from accepting a vendor's offer to pay for travel to and/or attendance at a conference, business meeting, or similar function without the prior written approval of the President, Provost, or Executive Vice President.

Customary business dealings involving payment for a meal or local entertainment are acceptable, provided that they are not excessive in frequency or amount and do not otherwise create the appearance of impropriety.

Employees involved in awarding or administering grants or contracts using federal or other government funds are prohibited by law from soliciting or receiving gratuities, favors, or anything of monetary value from current or potential contractors or sub-contractors.

Supervisors are responsible for ensuring that this policy is communicated to and understood by the employees in their unit and that it is effectively enforced. Any employee who receives an unsolicited gift from an individual or company seeking any advantageous action by, or relationship with, the University should immediately submit a written report to his or her supervisor specifying the date the gift was received, the donor, the estimated value, and other relevant information.

Any employee who violates this policy will be subject to disciplinary action.

THIS POLICY STATEMENT IS PART OF THE EMPLOYEE HANDBOOK, AND SHOULD BE READ IN CONJUNCTION WITH ALL OF THE POLICIES THAT COMPRISE THE HANDBOOK. THE PROVISIONS OF THE EMPLOYEE HANDBOOK DO NOT CONSTITUTE

AN EMPLOYMENT CONTRACT AND DO NOT ALTER THE AT-WILL STATUS OF AN EMPLOYEE.

END OF POLICY TEXT

Additional Resources Regarding This Policy

Related Policies and Procedures

- [Employee Handbook Policies Manual](#) (staff)
- [Code of Ethical Conduct](#)
- [Conflict of Interest Policy](#)
- [President's Statement of Commitment to Ethical Conduct](#)
- Research Conflict of Interest Policies
 - [Investigator Financial Conflicts of Interest Policy for Research](#)
 - [Institutional Conflicts of Interest in Research Policy](#)
 - [Researcher Financial Conflicts of Interest \(CRC IRB\) Policy](#)
 - [IRB Member and Consultant Conflict of Interest Policy](#)
- [Faculty Handbook](#) (faculty)

Related BU Websites

- [Human Resources](#)
 - [HR Policies](#)
 - [Manager Resources](#) - HR Website
- [BU's Conflicts of Interest Processes](#)
- [Where to Report a Concern](#)
 - [BU's Ethics and Compliance Hotline \(Anonymous Reporting Hotline hosted by EthicsPoint\)](#)
 - [Compliance Services Office](#)

- Office of the Ombuds
- Compliance Services Office

Categories: Employment, Gifts, Non-Represented Staff Keywords: acceptance of gift, acceptance of gifts, additional employment, coi, conduct, conflict of interest, conflicts of interest, consulting, Employee Handbook, ethics, financial interest, financial interests, gift policy, gifts, other employment, outside employment, personal gift