

## **CONFLICT OF INTEREST POLICY**

Approved By: Senior Management Team

Date of Last Revision: August 13, 2012

Responsible Office/Department: University Counsel Office

## **Policy Statement**

In the pursuit of its mission, Grand Valley State University through its Board of Trustees, Senior Management Team, faculty, staff and other representatives operates with the highest level of ethical behavior including, but not limited to, acting with integrity, reasonableness and fairness in our dealings, and avoiding bias or undue influence. Consistent with these values, the Board of Trustees has adopted institutional policies for identifying and managing potential, actual and perceived conflict of interest situations:

- GVSU Administrative Manual, Chapter 4, Section 1.6: Conflict of Interest
  - 1. **Employment**. Appointment of any relative of a faculty or staff member must be approved by the president in advance of the appointment in order to insure that no conflicts of interest exist. Each appointing officer must insure that no conflicts of interest exist in matters of appointment, retention, promotion, termination, assignment or other conditions of employment for relatives of faculty or staff members within his or her unit.
  - 2. **Financial**. It shall be the responsibility of the president (or his/her designee) to insure that conflicts of financial interest do not occur, and to take such steps to protect the university as seem to be required. The university respects the rights of its faculty and staff members in their activities outside their employment, which are private in nature and which in no way conflict with or reflect upon the university.
  - 3. **Political Candidates or Office Holder**. The university affirms the rights of its faculty and staff members as citizens to be active in political affairs, which do not conflict with the professional standards and ethics of their employment. It shall be the responsibility of the president (or his/her designee) to ensure that conflicts involving professional standards and ethics do not occur with Grand Valley State University faculty and staff members who are political candidates or office holders, and to take such steps to protect the university as may be required.

## • GVSU Administrative Manual, Chapter 6, Section O: Economic Development

Consistent with its public service mission, the University has a responsibility for supporting the economic development of the state, particularly west Michigan through a variety of initiatives including but not limited to the Van Andel Global Trade Institute, the West Michigan Science and Technology Initiative through the Grand Rapids SmartZone and the Muskegon SmartZone. These efforts will involve the development and commercialization of intellectual property using University resources, which may result in royalty or ownership interests for the benefit of the University. In compliance with MCL 15.321 et.seq, the President must review any conflict of interest and authorize such activities as may be deemed necessary when the University is an interested party in the joint development or commercialization of intellectual property with any employee of the University or a business in which the University employee has an equity interest. The President shall report his/her approval of such conflicts, including a summary of the issues and the rationale for his/her decision, at the next regularly scheduled board meeting, and shall make an annual report of all such conflicts.

## **Procedures**

In addition to the policy obligations described above, the University requires compliance with procedures to avoid or address conflicts of interest as provided by the following offices:

Topic: Procurement of Goods and Services
 Policy/Procedures: Procurement Services - Faculty & Staff

Responsible Office: Business & Finance Office

• Topic: Conflict of Interest Procedure for PHS-Funded Research

Policy/Procedures: 200/300 OSP: Conflict of Interest for PHS-Funded Research Only

Responsible Office: Office of Sponsored Programs

• Topic: Conflict of Interest Procedure

Policy/Procedures: 200/300 OSP: Required Conflict of Interest and Financial

Disclosure for Externally Sponsored Projects

Responsible Office: Office of Sponsored Programs

Topic: Human Subjects Research

Policy/Procedures: 25-0 HRRC Member Conflict of Interest Responsible Office: Human Research Review Committee

Topic: Human Subjects Research

Policy/Procedures: 25-1 Instructor Conflict of Interest
Responsible Office: Human Research Review Committee

• Topic: Institutional Animal Care and Use

Policy/Procedures: Institutional Animal Care and Use Committee Handbook of

Policies and Procedures

Responsible Office: Institutional Animal Care and Use Committee