

## **REVISED VERSION 06172015**

### **14.0 HUMAN RESOURCES POLICIES AND PROCEDURES**

#### **14.10 CONFLICTS OF INTEREST/ OUTSIDE EMPLOYMENT**

It is the policy of Alcorn State University that its employees conduct the affairs of the University in accordance with the highest legal, ethical and moral standards. Conflicts of interest should be avoided where possible or otherwise disclosed and managed. Further, employees shall not use their University position to secure personal financial benefits for themselves or any member of their immediate family.

A conflict of interest arises whenever the employee has the opportunity to influence University operations or business decisions in ways that could result in a personal financial benefit to the employee or a member of an employee's immediate family. Although certain specific examples of conflicts of interest are provided in this policy, they are meant only as illustrations, and supervisors and employees are expected to use good judgment to identify possible conflicts of interest and to manage such so as not to adversely influence Alcorn State University operations.

Nothing in this policy shall be construed to permit, even with disclosure, any activity that is prohibited by law. Violation of this policy may be grounds for immediate dismissal.

External activities can lead to conflicts of interest with regard to an employee's University responsibilities. As such, this policy is intended to provide a framework for recognizing and managing employee conflicts of interest and, whenever possible, for preventing even the appearance of conflicts of interest. While the primary goal of this policy is to prevent an employee's external activities from adversely influencing Alcorn State University operations, this policy is also intended to protect employees from undue suspicion that their external activities may improperly influence University operations.

Further, all employees must be available for and devote their full attention to their assigned duties and responsibilities during scheduled working hours. Additionally, employees having emergency response responsibilities must be reasonably available during non-scheduled hours. Each employee must ensure that his or her off-the-job activities do not adversely affect job performance with and are not contrary to the interests of the University.

The following guidelines and rules are established for all employees:

- All employees are required to complete and sign a Conflicts of Interest Policy Acknowledgement form upon hire.
- Employment with the University will be the employee's primary job responsibility and obligation; any other approved employment will be deemed secondary.

- The demands or requirements of outside or secondary employment may not be considered as excusable reasons for absences, tardiness, poor performance or other areas of concern from a personnel perspective.
- Prior to seeking or accepting outside employment, full-time employees must discuss a secondary job with the supervisor and/or department head to determine whether or not the job is considered a “conflict of interest” as previously defined herein.
- Current employees considering outside employment must submit a request in writing for approval to the supervisor and/or department head and complete the **Conflicts of Interest Disclosure** form prior to engaging in employment. Final approval of the President/IEO must be obtained. The request must also be completed if an outside activity exists at the time an employee is hired by the University.
- If the outside employment constitutes a conflict of interest, detracts from the employee’s responsibilities, or has an appearance of a “conflict of interest,” the request will be denied.
- If the President approves the outside employment, the **Conflicts of Interest Disclosure** form must be completed annually and placed on file in the Office of Human Resources.
- Unit heads shall carefully evaluate all circumstances relating to a potential conflict of interest before acting to approve or disapprove the associated activities. If the supervisor or department head approves the outside employment, the request shall be forwarded to the President/IEO for final approval.

The following are examples of conflicts of interest requiring employee disclosure. These examples are illustrations only and are not meant to be exclusive:

- Employee or immediate family member owns, in whole or in part, a business entity with which the University does or proposes to do business, and the employee is in a decision-making role or otherwise is in a position to influence the University’s business decisions regarding the business entity. The following are examples of business entities for which an employee disclosure is required:

- Finance or accounting services
- Athletic equipment services
- Consulting
- Counseling
- Catering
- PC or other hardware services
- Programming
- Architectural services
- Legal services
- Grant preparation

Temporary personnel services  
Office or lab supplies  
Painting services  
Lawn and grounds services

- Employee holds or assumes an executive, officer or director position in a for-profit or not-for-profit business or entity engaged in commercial, educational, or research activities similar to those in which the University engages.
- Employee participants in consultation activities for a for-profit or not-for-profit business or entity engaged in commercial, educational or research activities similar to those of the University.

See also reference to the Mississippi Code Annotated, §25-4-105(1) and §25-4-105(3) (a) regarding conflicts of interest.