



## Texas Christian University Policy

**Policy Number:** 2.071

**Subject:** Conflict of Interest

**Effective Date:** June 1, 2016

### **I. Statement of General Principles**

This policy addresses situations where there might be a potential financial or personal conflict, or the appearance of such a conflict, between a particular outside interest of a member of the University community and the obligation that the community member owes to the University such that the community member's profit or advantage may be, or may reasonably appear to be, at the expense of the well-being of the University.

- Members of the University community may not have a direct or indirect interest, financial or otherwise, of any nature that is in conflict with the proper discharge of the community member's responsibilities on behalf of the University.
- Members of the University community shall adhere to the laws, rules, regulations and policies of applicable governmental and University authorities. With regard to employees, the failure to do so may be grounds for disciplinary action, up to and including termination of employment.
- No member of the University community shall accept or solicit any gift, favor or service that might reasonably influence the community member in the discharge of his or her duties or that the community member knows or should know is being offered with the intent to influence his or her official conduct.
- A member of the University community shall not accept other employment or engage in any business or professional activity that he or she might reasonably expect would require or induce the employee to disclose confidential information acquired by reason of the community member's official position.
- No member of the University community shall disclose confidential information gained by reason of his or her official position or otherwise use such information for his or her personal gain or benefit.
- No member of the University community shall transact any business in his or her official capacity with any business entity of which the person or a member of his/her immediate

family is an officer, agent or member, or in which the member of the community or immediate family member owns a substantial interest unless a full disclosure has been made and approved as described in the following paragraph.

- Members of the University community must disclose potential conflicts of interest as soon as possible after they realize that a conflict or potential conflict may have arisen. A copy of the Conflict of Interest Policy, Disclosure Guidelines and Procedures, and Disclosure Report may be obtained from the Human Resources website at <http://hr.tcu.edu/wp-content/uploads/Conflict-of-Interest-Disclosure-Guidelines-and-Procedures.pdf>
- When a conflict or potential conflict of interest exists, it is required to be reported to the Office of the Vice Chancellor for Finance and Administration, and reported and reconsidered annually until it is resolved.

### **Financial Conflicts of Interest in Externally-Funded Research**

- For all persons, including TCU employees, TCU undergraduate, graduate or post-doctoral students, sub-recipient personnel, collaborators and consultants who are involved with externally sponsored programs at TCU **and** meet the definition of “Investigator” or “Senior//Key Personnel”, please refer to the Financial Conflict of Interest Policy that governs externally-funded research. A copy of this policy and all corresponding procedures and forms may be obtained from the Office of Sponsored Programs website at <http://research.tcu.edu/sponsored-programs/policies-and-procedures/>.

## **II. Administrative Responsibility**

The Office of Human Resources is responsible for administering and interpreting this policy.