



Policy Title:	Conflict of Interest Policy
Policy Number:	1007

1. Policy Statement

St. Matthew's University (SMU) expects faculty, staff, employees, and other persons acting on behalf of the University to carry out their duties with integrity, objectivity, transparency, and in the best interests of SMU.

Faculty and staff must not use their position at SMU to benefit, or seek to benefit, themselves or any other person or entity with whom they have a personal, professional, or financial relationship, unless the conflict of interest has been disclosed and agreed to by the Chancellor or designate.

2. Purpose

The purpose of this policy is to establish expectations for identifying, disclosing, reviewing, and managing actual, potential, or perceived conflicts of interest.

This policy is intended to protect the integrity of University decision-making and ensure that academic, administrative, financial, employment, and institutional decisions are made fairly and without improper influence.

3. Scope

This policy applies to all faculty, staff, employees, administrators, and other persons acting on behalf of SMU.

This policy applies to actual, potential, or perceived conflicts of interest that may arise in academic, administrative, financial, employment, procurement, research, supervisory, advisory, or other University-related activities.

4. Conflict of Interest

A conflict of interest may arise where a person's personal, professional, financial, or other outside interest could improperly influence, or appear to improperly influence, the performance of their University duties or responsibilities.

A conflict of interest may exist even where no improper action has occurred. Perceived conflicts of interest must be disclosed and managed in the same manner as actual or potential conflicts.

5. Disclosure Requirements

Faculty and staff must disclose any actual, potential, or perceived conflict of interest as soon as they become aware of it.

Disclosure must be made before the individual participates in, recommends, approves, or influences any decision, transaction, personnel action, academic matter, or other University activity connected to the conflict.

The disclosure must provide enough information for SMU to assess the nature of the conflict and determine whether it can be managed, approved, restricted, or prohibited.

Disclosures must be submitted to the appropriate Dean, supervisor, or designated University official and, where required, must be reviewed and agreed to by the Chancellor or designate before the individual participates in the matter.

6. Transactions and Financial Relationships

A faculty or staff member who recommends, approves, or participates in any transaction between SMU and a person or entity with whom the faculty or staff member has a personal, professional, or financial relationship must disclose that relationship and seek authorization before recommending, approving, or participating in the transaction.

This includes, but is not limited to, contracts, purchases, services, consulting arrangements, vendor relationships, partnership arrangements, or other transactions involving SMU resources, funds, or decision-making authority.

7. Personnel and Academic Decisions

A faculty or staff member who recommends, approves, or participates in a personnel action involving a person with whom the faculty or staff member has a personal, professional, or financial relationship must disclose that relationship and seek authorization before recommending, approving, or participating in the personnel action.

Personnel actions may include, but are not limited to, hiring, appointment, promotion, evaluation, discipline, termination, compensation, scheduling, assignment of duties, or other employment-related decisions.

Where a conflict involves an academic decision, supervisory relationship, student matter, assessment, grading, advising, mentoring, or committee decision, the conflict must be disclosed and managed before the individual participates in the matter.

8. Approval and Management of Conflicts

A disclosed conflict of interest must be reviewed by the appropriate University authority and, where required, agreed to by the Chancellor or designate.

SMU may determine that the conflict:

- Does not require further action;
- Requires disclosure to affected parties;
- Requires the individual to abstain from discussion, decision-making, recommendation, approval, or voting;
- Requires reassignment of responsibilities;
- Requires oversight or monitoring;
- Requires written conditions or limitations; or
- Cannot be managed and must be avoided.

Where approval is granted, the approval may be subject to conditions.

9. Outside Employment and Consulting

Faculty members with full-time appointments must not engage in outside employment, including consulting or self-employment, without the advance written consent of the Dean and the Chancellor.

Outside employment or consulting must not interfere with the faculty or staff member's duties, create a conflict with SMU's interests, misuse SMU resources, or create confusion regarding whether the individual is acting on behalf of SMU.

10. Use of Position, Resources, or Name

Faculty and staff must not use their position, title, authority, access, confidential information, or SMU resources for unauthorized personal benefit or for the benefit of another person or entity.

Faculty and staff must not use the name of SMU, or represent a connection with SMU in a business, speculative venture, endorsement, or external activity, unless authorized by SMU.

11. Failure to Disclose or Manage a Conflict

Failure to disclose an actual, potential, or perceived conflict of interest, or failure to comply with conditions established by SMU to manage a conflict, may result in corrective action or disciplinary action, up to and including termination of employment or appointment, where applicable.

12. Definitions

These definitions apply to terms as they are used in this policy.

Word/Term	Definition
Conflict of Interest	An actual, potential, or perceived situation where a person's personal, professional, financial, or other outside interest may improperly influence, or appear to improperly influence, the performance of their University duties or responsibilities
Financial Interest	A financial relationship, benefit, payment, ownership interest, compensation, gift, contract, consulting arrangement, or other financial matter that could influence, or appear to influence, a person's University duties or decision-making.
Personal Relationship	A family, romantic, close personal, household, or other relationship that could influence, or appear to influence, a person's University duties or decision-making.

13. Responsibility

Faculty, staff, employees, administrators, and other persons acting on behalf of SMU are responsible for identifying and disclosing actual, potential, or perceived conflicts of interest.

Supervisors, Deans, and other designated University officials are responsible for reviewing disclosed conflicts and determining appropriate management measures.

SMU is responsible for reviewing conflicts of interest and determining whether a conflict may be approved, restricted, managed, or prohibited.

SMU reserves the right to amend or update this policy from time to time.