

Union Theological Seminary

Annual Conflict of Interest Disclosure Process

All employers are entitled under the law to know that their staff and Board members are working for them and not against them. It is easy to understand, for example, that it wouldn't be right if you were working for a private company in your spare time and helping them do well by giving them confidential information you learned at Union or helping a third party obtain contracts with Union in return for the gifts they were giving you. But sometimes it's not so easy to recognize what a conflict is, or when a relationship might make it look to someone else like you had a conflict (which is called an "apparent conflict").

Not all conflicts are bad; in fact, many are good. It is a good thing for Union faculty, staff and Board members to be asked to serve on the boards of local corporations and non-profits, and good to be seen by others (and paid) as consultants or experts in a field. But Union (and your supervisor) has the right to know about those things, and to decide that it is good. And if there is a "bad" conflict, or the potential of one, it's in everyone's interest (including yours) to talk about it early on. That's why it's always a better practice to disclose and seek permission for something you are not sure is or is not a conflict. If it is deemed to be a conflict that you have not reported you may be reprimanded or even lose your job (if it's really serious).

The Union Theological Seminary Conflict of Interest Policy ("COI Policy") requires all of us to take the time to think about these things at least once each year and to disclose any actual or possible conflicts of interest -- things that have occurred since the last time you filled out a disclosure form, and situations in which you now find yourself or expect to be. It's also part of that annual process that we remind ourselves of the duties that all of us owe each other and are a part of our Code of Conduct.

The COI policy also requires that after disclosure, any such conflict of interest must be approved by the employee's direct supervisor, and absent this approval, the conflict must be resolved. After a conflict is reported to an employee's supervisor and acted upon, it must then be reported to the Vice President for Finance and Operations.

The COI policy also expressly forbids any UTS employee from accepting or soliciting any gift of any value, favor, or service designed, or giving the appearance of being designed, to influence the employee's decision-making or professional conduct.

Conflict of Interest Defined. The following circumstances shall be deemed to create a Conflict of Interest:

1. A trustee, officer or employee (or family member of any of the foregoing) is a party to a contract or involved in a transaction with Union Theological Seminary for goods or services.
2. A trustee, officer or employee (or family member of any of the foregoing) has a material financial interest in an entity involved in a transaction between Union Theological Seminary or an entity in which the trustee, officer or employee (or family member of any of the foregoing) is a director, officers, agent, partner, associate, employee, trustee, personal representative, receiver, guardian, custodian or other legal representative.
3. A trustee, officer or employee (or a family member of any of the foregoing) is engaged in some capacity or has a material financial interest in a business or enterprise that competes with Union Theological Seminary.

Family Member Defined. A family member for purposes of this policy is a spouse, parent, child, child's spouse, sibling or sibling's spouse.

If you answer "Yes" to any question below, you will be asked for details. Your completed form will be forwarded to the appropriate administrator(s) and or trustee(s) for review and resolution. An employee is credited with completion when all of the questions are answered and the form submitted.

Questions

1. Have you accepted a gift, service or benefit of any kind from any person who can influence the exercise of your professional judgment on behalf of Union Theological Seminary or any related entity?

If yes, please explain in the space provided below.

2. Are you or any family immediate family member involved in a transaction involving the provision of any goods or services of any kind to Union Theological Seminary?

If yes, please explain in the space provided below.

3. Do you or any immediate family member have any financial, ownership, or management interest in any entity that provides educational services, or goods or services of any kind to Union Theological Seminary or any related entity?

If yes, please explain in the space provided below.

4. Do you perform any consulting services for third parties outside of Union Theological Seminary or do you receive compensation from third parties for your services which relate to your work at Union Theological Seminary or the work of Union?

If yes, please explain in the space provided below.

5. Do you perform any consulting services for third parties outside of Union Theological Seminary or do you receive compensation from third parties for your services which are unrelated to your work at Union Theological Seminary or the work of Union that may inhibit or detract from your work at Union Theological Seminary?

If yes, please explain in the space provided below.

6. Do you feel you have any other conflict of interest not stated above?

If yes, please explain in the space provided below.

Employee Name _____ Signature: _____ Date _____

Supervisor's name _____ Signature: _____ Date _____

Conflict approved _____

Conflict disapproved _____