Conflict of Interest Policy

Policy Overview
Harvard University Information Technology manages significant spending and valuable assets on behalf of the University as a whole as well as for the schools and affiliated institutions. In support of these important obligations of trust, it is essential that each employee perform his or her duties in a manner that will ensure no conflict between personal interests and those of Harvard University. HUIT subscribes to the broad principles outlined in the *Policy Statement on Conflicts of Interest*, adopted in 1975 by the Governing Boards for their own members and for the University's vice presidents, and deputy and assistant treasurers.

Conflict of Interest
A conflict of interest exists when an individual's commitment to the University may be compromised by personal benefit. Every employee is expected to avoid situations or activities that could interfere with his or her unencumbered exercise of judgment in the best interest of Harvard University. In addition, it is considered inappropriate for any employee to make use of University property or other resources, including time, to advance personal interests and/or activities during the course of his or her employment at Harvard.

Disclosure
Most problems with conflict of interest or commitment can be prevented through prompt and thorough disclosure of the activity to HUIT senior management. **It is the responsibility of all employees to disclose anything which may have the potential for a conflict of interest.** All such disclosures shall be documented, and copies of the documentation will remain in the University's employment records.

It is the responsibility of HUIT senior management to evaluate all issues concerning potential conflicts of interest and to inform employees of this policy. If a potential conflict is disclosed, the employee(s) involved shall refrain from participation in the identified activity until the matter has been resolved.

Conflict of Commitment
All outside activities must be performed on the employee's personal and/or accrued vacation time. In no case are consulting activities or other outside pursuits permissible on University time, nor is it permissible to use University resources such as office equipment, supplies, or support staff in the course of outside consulting or personal business. These pursuits or personal activities must not divert the employee's attention from the University duties or consume so much time or creative energy that they interfere or appear to interfere with the
employee's responsibilities to the University. This policy is not intended to limit reasonable participation in professional and community activities which benefit and reflect positively on the University, by mutual agreement of the employee and the supervisor.

Vendor Relationships
For the purpose of this policy, vendors shall include present, former or potential suppliers of goods and services to the University and its affiliated institutions. Employees should pay special attention to ensuring they maintain the proper relationship between themselves and vendors of goods and services to the University. It is HUIT policy to discourage vendors from offering gifts of any kind to any employee or member of any employee's family. Such activity serves no useful business purpose, and can create conflicts of interest. It is recognized, however, that despite this policy, HUIT employees may occasionally be offered token gifts from suppliers as a gesture of good will and appreciation - often during the year-end holiday season. In such cases, the following guidelines shall apply to all employees:

1. No employee (or family member of an employee) shall accept any gift, regardless of value, from any supplier, under any circumstances.

2. Any meals or entertainment offered by a supplier shall be for bona fide business reasons, and shall not include travel or accommodation expenses. Employees attending meetings at supplier's facilities or conventions shall do so for business reasons at the expense of the University.

3. On the rare occasion that an employee is asked to participate on Vendor Advisory Committee they may do so at the expense of the vendor with prior approval from their group Director.

4. No employee (or family member of an employee) shall, under any circumstance, accept any offers of kickbacks, preferential treatment, or any form of favoritism from any suppliers. Should any employee become aware of any such offer, her or he shall immediately notify a member of HUIT senior management.

If it is discovered that an employee has accepted a kickback, more than a token gift, or other favored treatment in violation of this policy, the employee will be subject to disciplinary action, up to and including termination of employment. It is important that employees refrain from establishing employment or contractual relationships with any vendor eligible to provide the University with goods or services for a fee. Employees should not engage in any activities which are directly or indirectly competitive with
the operations of HUIT. If HUIT employees provide consulting services or perform work outside of Harvard on their own time, the work must not be performed for a vendor or potential vendor; it must not be competitive with the operations of HUIT; and in all instances the employee's managers or supervisor must be informed of the situation.

Employment of Family Members
HUIT strongly discourages hiring family or household members of current HUIT employees if they would be in the same work group. This policy applies to all positions (regular and temporary) unless extenuating circumstances caused by University guidelines, consolidation or displacement require an exception. All exceptions must be approved by the business unit manager and Human Resources. HUIT employees may not negotiate with or establish a contractual relationship with a vendor on behalf of HUIT if the vendor is owned or managed by a family or household member or if a family or household member will be engaged in the delivery of the goods or services. If the potential for such a situation exists, it should be disclosed and whether the vendor should be eliminated from consideration of the HUIT employee should withdraw from the vendor selection process.

Policy Violation

Any violation of these policies may lead to suspension of access and immediate review, with the possibility of revocation of privileges, or disciplinary action in accordance with Harvard University rules and procedures up to and including termination of employment.

For More Information

Visit Harvard’s Conflict Of Interest or Commitment Policy