

Individual Conflict of Interest and Commitment Policy

Rochester Institute of Technology

1. Introduction

This document states the Institute's Individual Conflict of Interest and Commitment Policy ("ICIC Policy"), which is designed to protect the integrity of the Institute, its faculty, staff, students, and the scholarship process.

The Institute encourages interactions with external entities that are beneficial to the professional standing of employees, the reputation and mission of the Institute, or serve the community or profession at large. Such interactions may involve conflicts of interest or commitment. In either case, however, the Institute expects employees to act with a high standard of integrity and ethical behavior and to avoid ethical, legal, financial, or other conflicts of interest or commitment, including even the appearance of a conflict, that might impede or compromise their Institute responsibilities or the mission of RIT.

Most potential, real, or perceived conflicts of interest and commitment which occur during the course of everyday academic life can be managed through disclosure and transparency. Unreported or unresolved conflicts, on the other hand, can disrupt or even potentially threaten the integrity of the individual and scholarship, research, instruction, evaluation, or administration of the Institute.

The Institute's ICIC Policy is designed to assist the free flow of knowledge and ideas and help ensure that public and institutional resources are used appropriately. It mandates a practice of transparency and the management of conflicts of interest and commitment, whether potential, real, or perceived, to help ensure that RIT's alliances with external entities further the aims of the individual and the Institute.

2. Statement of Policy

The ICIC Policy requires that all RIT faculty & staff disclose all potential, real, or perceived conflicts of interest or commitment to the immediate university supervisor. If, after evaluation, a conflict is found to be significant or unacceptable, it shall be removed or managed as described in Section 4 of this Policy.

3. Scope of Policy

All regular faculty (as defined by Institute Policies and Procedures) and staff are subject to the ICIC Policy. The ICIC Policy may be extended to other groups, including student employees, visiting scholars and scientists, consultants, and vendors, at the discretion of the applicable immediate supervisor provided that the extension is stated in writing.

The ICIC Policy encompasses two types of conflict:

1. A **Conflict of Interest** exists whenever an employee's personal, professional, commercial, or financial interests or activities outside of the Institute have the possibility—whether potential, real, or perceived—of: a) compromising the employee's judgment; b) biasing the nature or direction of scholarship; c) influencing the employee's decision or behavior with respect to teaching, student affairs, promotions and appointments, use of Institute resources, interaction with human subjects, or other matters of interest to the Institute; or d) resulting in personal or a family member's¹ gain or advancement at the expense of the Institute. It is important to keep in mind that an employee does not have to actually do anything wrong or improper for a conflict of interest to exist; the conflict exists by virtue of a relationship that *could* result in an undue influence on the employee's professional judgment.
2. A **Conflict of Commitment** exists whenever an employee's external commitments, relationships, or activities have the possibility—whether potential, real, or perceived—of interfering or competing with the Institute's mission, or with that employee's ability or willingness to perform the full range of responsibilities associated with his or her position.

4. Operating Procedures

To help ensure that RIT and its employees are not compromised by even the appearance of a conflict, employees must report outside activities to their immediate supervisors. Outside activities are defined as relationships, commitments, or activities on the part of the employee or his/her family that might present or appear to present conflicts of interest or commitment with regard to the employee's employment at RIT. Outside activities may be uncompensated or they may involve financial or fiduciary obligations.

¹Family members (or family) are defined as parents, children, siblings, spouses, in-laws, domestic partners, and dependents.

Outside activities should be reported upon employment, annually thereafter, and any time circumstances arise that may create conflicts of interest or commitment. When a supervisor determines that conflicts of interest or commitment exist, the supervisor, in consultation with the employee, shall develop a plan to manage or eliminate the conflict. The disclosed outside activities of an employee and any resulting management plan must be approved by two levels of management, beginning with the immediate supervisor. Unresolved conflicts shall be referred to the Individual Conflict of Interest and Commitment Committee (ICIC Committee). Decisions of the ICIC Committee can be appealed to the Provost or ranking divisional officer, whose determination is final.

“Procedures for the Implementation of the Conflict of Interest and Commitment Policy” details the step-by-step course of action for annual and *ad hoc* disclosures, conflict management, oversight, sanctions, and appeals processes.

The ICIC Committee shall be a standing RIT committee of eight (8) members selected by campus constituency groups as follows:

- One member selected by the Provost, serving a three-year term
- One member selected by the Vice President for Finance and Administration, serving a three-year term
- Three members selected by the Academic Senate, serving staggered three-year terms
- Two members selected by Staff Council, serving staggered three-year terms
- One *ex-officio*, non-voting member appointed by the Vice President for Research who shall provide administrative support to the Committee.

The ICIC Committee shall deliver an annual report to the Academic Senate, Staff Council, Institute Council, and to the Chairman of the Board of Trustees. Except to the extent necessary to carry out its functions, the Committee’s proceedings shall be kept confidential by its members.