

Pacific Graduate School of Psychology

POLICY REGARDING CONFLICTS OF INTEREST AND CONFLICTS OF COMMITMENT

1. **Avoidance of Conflicts.** PGSP officers, faculty, staff, other employees and consultants are obliged by this Policy to refrain from conduct which gives rise to conflicts of interest and conflicts of commitment. [Definitions below.]
2. **Disclosure to Cognizant PGSP Officer.** PGSP officers, faculty, staff, other employees and consultants shall, in all situations where a conflict of interest or of commitment might reasonably arise, immediately disclose the matter in writing to the Vice President for Academic Affairs in the case of faculty and to the Vice President for Business Affairs and CFO in the case of all others (“cognizant PGSP officers”), and shall refrain from participating in the matter unless and until written approval from the cognizant PGSP officer is received. The Vice President for Academic Affairs and the Vice President for Business Affairs and CFO shall disclose to the President. The President shall disclose to the Chair of the Board.
3. **Conflict of Interest Involving Relations with Non-PGSP Entities.** PGSP officers, faculty, staff, and other employees shall at all times deal on behalf of the PGSP with non-PGSP entities in a manner that excludes any consideration of personal advantage for themselves. Non-PGSP entities are defined to include actual and prospective granting agencies, donors, government agencies, contractors, suppliers, consultants, and other entities or persons doing, or seeking to do business or engage in a relationship with the PGSP. Other prohibited conflicts of interest occur when there is such a divergence between an individual's private interests and his or her employment obligations to the PGSP, such that an independent observer would reasonably question whether the individual's actions or decisions in respect to the PGSP are determined or influenced by considerations of personal gain, financial or otherwise.
4. **Conflict of Commitment to PGSP.** Full-time PGSP officers, faculty, and exempt staff owe their primary commitment of time and intellectual energies to their PGSP functions. The definition of PGSP functions for any such individual largely relates to the specific responsibilities, functions and professional activities of the PGSP position held by that individual and the expectations for that position that are held by the department or other unit(s) to which the position reports. Full-time and part-time PGSP officers, faculty, exempt staff, and other employees do engage in permitted non-PGSP activities, for example, consulting, private practice, public service or pro bono work; however, they must nevertheless take care that their physical presence at the PGSP and their dedication of time and energies to the PGSP do not thereby diminish. Specific expectations of physical presence at the PGSP and of time commitment to the PGSP are determined by the position and the policies applicable to that position (e.g., faculty policy limits external professional work of full-time faculty to one work day per work week).
5. **Nepotism:** It is the policy of the PGSP to hire the best-qualified candidates and to avoid conflicts of interest in hiring or promoting employees. A family member may not be employed in a position of PGSP employment within the same organizational unit. A supervisor shall never recommend or approve any employment-related action for any employee to whom s/he is a member of an immediate family as defined in this policy. A close personal relationship shall be

treated as if it were such a family relationship if it includes a sexual or romantic relationship or a similarly close personal relationship engaged in outside the PGSP.

6. **Gifts and Gratuities:** PGSP officers, faculty, staff, and other employees shall not accept personal gifts, gratuities, favors, accommodations or similar things of value, from non-PGSP entities, if those things of value reasonably would be expected to adversely affect their discharge of PGSP functions to the exclusive benefit for the PGSP. Personal receipt of all gifts, gratuities, favors, accommodations or similar things of value, from non-PGSP entities, shall be immediately disclosed in writing to the cognizant PGSP officer.

7. **Use of PGSP Property:** PGSP officers, faculty, staff, or other employees shall not transmit to non-PGSP entities, or otherwise use for their personal gain, PGSP-owned, funded, or supported property, work product, data, or other information or materials that are the property of PGSP. Faculty use of PGSP telephone and electronic communications facilities, personnel, equipment and other PGSP resources, for non-PGSP business or professional activities, shall be permitted, but kept to an incidental extent.

8. **Family Members:** There will be no transactions between the PGSP, on the one hand, and PGSP officers, faculty, staff, and other employees or a member of their immediate family¹ (hereinafter called "family member") or any business entity in which an employee or a family member has a substantial interest², on the other hand, except where all facts of the matter are interest fully disclosed in writing to the cognizant PGSP officer who has determined that the contract or transaction is not unfair as to the PGSP.

9. **Other Conflicts:** Other prohibited conflicts of interest occur when there is such a divergence between an individual's private interests and his or her employment obligations to PGSP, such that an independent observer would reasonably question whether the individual's actions or decisions in respect to PGSP are determined or influenced by considerations of personal gain, financial or otherwise. A conflict of interest depends on the situation, and not on the character or actions of the individual.

¹ Member of the immediate family means spouse, parent, domestic partner and children, and those who stand in such position by marriage, domestic partnership, adoption, etc.

² Substantial interest excludes a) the interest of a person in a corporation, firm, or other organization as a debt or equity holder where the debt or equity held is less than 1% of the outstanding debt or equity of such corporation, firm, or other organization; b) the interest of a person in a corporation, firm, or other organization by reason of being a director, officer, employee, or their equivalents; c) the interest of a director of a corporation or a member of one's immediate family in another corporation, firm, or other organization which arises by reason of the fact the corporation is a creditor of such other corporation, firm, or other organization.