

Approval Authority: President's Office

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POLICY

NVIT affirms that all employees shall conduct themselves in such a manner that they will not enter into a conflict of interest with their employer.

GUIDELINES

1. In this policy, "conflict of interest" means any situation where the personal interests of an NVIT employee may conflict with the interests of the Institution. Conflict of interest situations may include, but are not limited to:
 - A. An employee of the Institute has a direct or indirect financial interest in a proposed contract or transaction with NVIT.
 - B. An employee allows a relationship between an applicant or other employee (based on business, kinship, marriage or a close personal relationship) to influence the employee's work, work situation or status to the advantage or disadvantage of any of the persons involved in such a relationship.
 - C. An employee initiates or permits the initiation of a sexual liaison with a student while they are in an employee/student, instructor/student or employee/client relationship or where it is reasonable to assume they may, in the immediate future, be in such a relationship.
 - D. An employee initiates or permits the initiation of a sexual liaison with a fellow employee whom they supervise.
 - E. An employee uses confidential Institute records in an unauthorized manner or for unauthorized purposes for personal or private gain, advantage or benefit.
 - F. An employee uses his/her status for the employee's private advantage, whether personal or professional.
 - G. An employee is directly involved in the hiring or supervising of a person with whom they are in a relationship (based on business, kinship, marriage or a close personal relationship).
 - H. An employee uses his/her position at NVIT in a way that provides a benefit or withholds a benefit to someone else who has a relationship with the employee (based on business, kinship, marriage or a close personal relationship).
2. If an employee becomes involved or will become involved in a situation that is, or may be perceived to be, a conflict of interest, the employee must immediately disclose the matter to the senior administrator responsible for his/her function. The senior administrator will determine if a conflict of interest exists, will exist, or may be perceived to exist, and initiate steps to remedy the situation. If the employee fails to disclose the conflict of interest immediately or fails to abide by the senior

administrator's decisions to address the conflict of interest, the employer maintains the right to take action including disciplinary action up to and including suspension and dismissal, as appropriate.

Employees who declare to their senior administrator they are in, will be, or may be perceived to be in a conflict of interest situation will not be disciplined if such communication is provided in a timely manner as described above and the employee takes steps to abide by the senior administrator's remedies. In the case of an unavoidable after the fact notification of conflict of interest, the employee may still avoid disciplinary action by having taken specific steps to avoid acting in conflict of interest

3. NVIT recognizes the right of employees to be involved in activities as citizens of the community but employees must keep their role as private citizens separate and distinct from their responsibilities as employees of NVIT.

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