

## **Conflict of Interest and Commitment Management Plans**

When a management plan is required because a Brown familial relationship indicates a conflict of interest or commitment, the plan must identify how the family member whose position holds institutional seniority or authority will ensure they will not participate, influence, or shape the terms and conditions of employment or engagement of the less senior family member. Management plans should be submitted in Workday with the annual disclosure process; submitting in Workday serves as your electronic signature.

When a management plan is required because of outside employment or financial interests or public service, the plan must ensure the staff member's Brown position is not being leveraged to enable these outside interests, and the Brown employment will be the staff member's priority. Management plans required to address these conflicts must also ensure Brown systems, equipment, and supplies will not be used in support of these outside commitments.

A management plan's length and complexity depends on the nature and specifics of the conflict. At a minimum, it should state measures designed to mitigate any potential for conflict of interest or commitment and include the following elements:

1. Staff member's name, title, and department
2. Supervisor's name and title
3. A description of the staff member's primary duties at Brown
4. Specific identifying information concerning the person, business, or entity that is the basis for the conflict (e.g., name, business address, dates or hours of involvement with employee and/or Brown; relationship to Brown as vendor, consultant, donor, student, parent, employee, business partner, or investment holding)
5. A description of the relationship or situation that poses the conflict
6. A description of the circumstances presenting a conflict between these interests, indicating if this conflict might happen (potential) or already exists (actual) or interpreted in a particular way (perceived) including examples of how an employee could act in favor of the non-Brown interest and what the detriment or risk to Brown could be
7. A description of the management mechanisms for addressing the conflict and detailing how Brown's interests will be protected