**Conflict of Interest and Commitment Guidelines**

These guidelines are examples of (1) prohibited conflicts, (2) conflicts that may not be prohibited but must be disclosed for resolution or management, and (3) activities that are unlikely to involve conflicts. The University relies on members of the Brown community to adhere to the [Conflict of Interest and Commitment Policy](https://www.brown.edu/about/administration/policies/conflict-interest-and-commitment-20065) and commonly accepted rules of ethical and professional conduct to identify additional instances of conflicts not listed below.

# Prohibited Activities

The following conflicts of interest or commitment are prohibited:

* Hiring/supervising a family member as an employee
* Receiving remuneration from Brown and an outside source for identical services or activities without approval from your supervisor
* Using privileged University information for personal gain, or assisting an outside organization in obtaining a preferred position with respect to such information
* Authorizing a consulting contract at Brown for a family member
* Advocating for or requesting employment at Brown for a family member
* Soliciting personal gifts from a donor, prospective or former student or parent, or others with whom there is a potential or existing business or professional relationship
* Authorizing University-paid travel for a family member
* Voting on the award of University business to a vendor in which you have a significant financial interest or by which you are employed
* Authorizing a Brown donation to or purchase from an organization on which board you serve
* Using the University name, likeness, or logo other than in the context of University responsibilities
* Receiving and keeping personal gifts in excess of $100 or of an undetermined value
* Investing personally owned stock in a privately held business venture of a subordinate or student or trainee.

# Activities Requiring Disclosure and Review

While all possible conflicts of interest or commitment must be disclosed, they may not all be prohibited. Some may be managed through administrative oversight and/or recusal of the disclosing individual from certain decisions at the University. Others may be considered sufficiently resolved through disclosure alone. Managers, senior administrators, or others who review disclosures are responsible for making these determinations and, when they determine there is a conflict that must be managed or eliminated, documenting the plan for resolution and communicating it to affected parties.

The following are examples of possible conflicts of interest or commitment which require disclosure and review:

* Receiving remuneration of $5,000 or more from another entity
* Having a significant financial interest in an entity that either has Brown as a large customer or supports your University activities
* Accepting a gift valued up to and including one hundred dollars ($100) from a donor; current, prospective or former student or parent; or others with whom there is a potential or existing business or professional relationship.
* Serving as an administrative supervisor of a spouse or child who is employed at Brown or otherwise subject to this policy
* Holding a position at Brown that is responsible for a function to which a family member is subject
* Negotiating forgiveness of Brown debt for a company in which you are invested
* Providing consulting services to an outside agency or (non-Brown affiliated) foundation that may give the University a preferred position with respect to grants or contracts
* Candidacy, election, or appointment to a public office
* Outside activities in which there is more than an incidental use of University facilities, equipment, and/or services
* Management, employment, consulting, and other contractual activities with, or ownership interest in, a business entity that competes with the University
* Participating in the negotiation of a contract between the University and an organization in which the Brown community member, family member, or an associate has a significant financial interest

# Activities Unlikely to Involve Conflict

The following activities are unlikely to involve a conflict of interest and do not need to be reported unless they involve an amount of time or effort that introduces a conflict of commitment.

* Consulting services making use of your general research or professional background that do not involve a significant financial interest
* Authorization of payment of dues and/or conference fees for professional organizations on which board you serve