

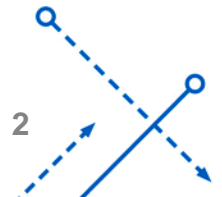


CONFLICT OF INTEREST

Defining Conflict of Interest and how you
can help manage it.

SUNY DEFINITION OF CONFLICT OF INTEREST

Any Interest, financial or otherwise, direct or indirect; participation in any business, transaction, or professional activity; or incurring of any obligation of any nature, which is or appears to be in substantial conflict with the proper discharge of an employee's duties in the public interest.



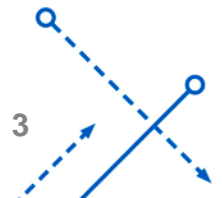
The appearance of **benefit** and/or **bias** by decision makers.

BENEFIT

A conflict of interest arises when a faculty or staff member may **benefit personally** (or appear to do so) from dealings with an entity or person conducting business with UB. This includes **indirect benefits** to family members or businesses with which the person is closely associated.

BIAS

Financial or other considerations may **compromise** (or have the appearance of compromising) the **employee's objectivity** or independent professional **judgment**.



Perceived versus Actual Conflict of Interest

If a reasonable, disinterested person would conclude that an individual might emphasize personal interests over the University's interests, there is an appearance of a conflict of interest.

Things that make you go hmmm.....



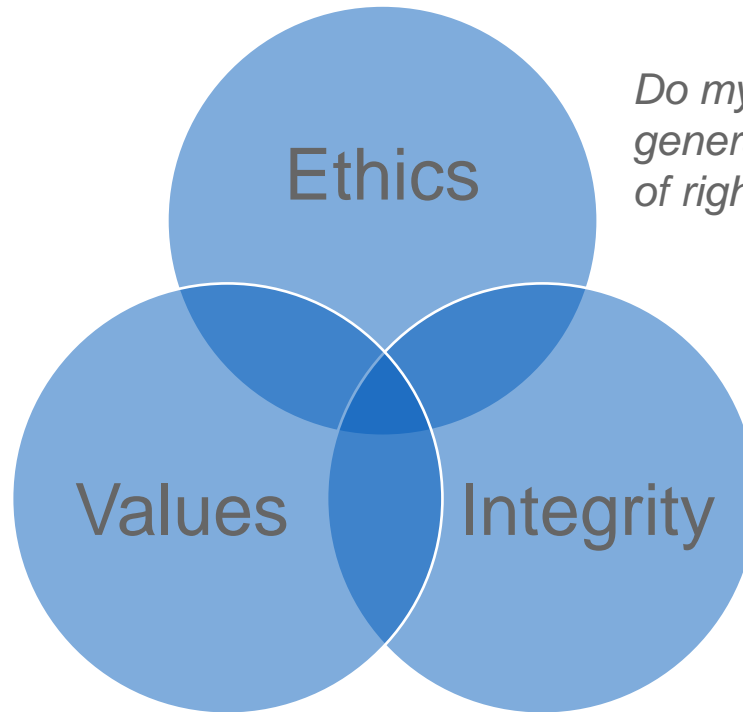
Conflicts are NOT inherently bad or wrong

- Procurement choices are limited.
- Personal referrals may result in discounts and/or identifying the most qualified option.



Let UB know if there are any real or perceived conflicts !!!

Questioning whether you have a conflict?



Do my actions reflect the generally accepted standards of right versus wrong?

Do my actions align with my personal values and UB's values?

*Am I being honest about the situation?
Do the right people know what is going on?*

As soon as you suspect a conflict exists

- **DISCLOSE:** Transparency is key. Let Procurement and your supervisor know that a conflict may exist.
- **MITIGATE:** Take steps to ensure a fair and level playing field among multiple, qualified vendors through the competitive bid process.
- **ABSTAIN:** Recuse yourself from decisions where there is a risk of bias either real or perceived.





Questionable relationship between an employee and a vendor impaired \$267K bid



University Official Awards Contracts to Friends



Bid-rigging to favor themselves and favored contractors



President awarded no bid consulting contract to a friend



Things to Remember

- Conflicts of interest are frequent in higher education and within a community the size of Buffalo. Be aware of the risk.
- A perceived conflict is as potentially damaging as a real conflict.
- Err on the side of caution. It's better to over-disclose than under-disclose!



Any Questions?

