



**THE GEORGE  
WASHINGTON  
UNIVERSITY**  
WASHINGTON, DC

**Responsible University Official:** Vice President for Human Resources  
**Responsible Office:** Office of the Vice President for Human Resources  
**Last Revised Date:** September 1, 2005

## CONFLICT OF INTEREST RECORDS ENTRY POLICY

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### Policy Statement

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It is the policy of the university that employees may not make any entries, changes, or postings to their own accounts, records, or files or to those of their immediate family and/or members of their household. Violation of this policy may result in disciplinary action, including termination.

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### Reason for Policy/Purpose

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The university's commitment to conducting its activities with the highest ethical standards requires that its employees avoid the appearance, as well as the actuality, of any conflict of interest or breach of trust.

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### Who Needs To Know This Policy

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Faculty and staff

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## Policy/Procedures

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Employees may not make any entries, changes, or postings to their own accounts, records, or files or to those of their immediate family and/or members of their household. Even those routine transactions, that are part of an employee's daily job duties, may not be processed for the employee, the immediate family, or household members' records and accounts. For example, payroll staff may not adjust their own withholding. GWorld staff may not add points or debits to their roommate's cards.

However, this does not include those "self-service" functions that do not involve special job access. For instance, employees may correct their own listings in the online directory, or register for classes online.

Employees also may not share their PIN numbers, identification numbers, passwords or other types of system access codes with other employees to facilitate the adjustment of their personal information and records or that of their family or members of their immediate household.

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## Website Address for This Policy

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[GW University Policies](#)

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## Contacts

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Subject	Contact	Phone
Questions	University Human Resources	(202) 994-9610

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## Definitions

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- Record Alteration** Any entries, changes, or postings to a restricted record or file.
- Immediate Family** Immediate family includes mother, father, children, sisters, brothers, stepbrothers, stepsisters, spouse, grandparents, in-laws, uncles, aunts, nieces, nephews and cousins.
- Household** Anyone with whom the employee shares a house, apartment, or other living arrangement.

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## **Who Approved This Policy**

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Louis H. Katz, Executive Vice President and Treasurer  
Beth Nolan, Senior Vice President and General Counsel

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## **History/Revision Dates**

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**Last Reviewed Date:** April 30, 2014

**Last Revised Date:** September 1, 2005

**Origination Date:** March 25, 2002