CONFLICT OF INTEREST RECORDS ENTRY POLICY

Policy Statement

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.

Reason for Policy/Purpose

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.

Who Needs To Know This Policy

Faculty and staff

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Policy/Procedures

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. GWWorld 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.

Website Address for This Policy

GW University Policies

Contacts

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<td>Questions</td>
<td>University Human Resources</td>
<td>(202) 994-9610</td>
</tr>
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Definitions

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

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

History/Revision Dates

Origination Date: March 25, 2002
Last Amended Date: September 1, 2005
Next Review Date: April 30, 2015