

**Approving University Official(s):** Provost and Executive Vice President  
**Responsible Office:** Northwestern University Conflict of Interest Office (NUCOI)  
**Effective date:** June 2024  
**Next review date:** June 2027

## **Policy on Conflict of Interest and Conflict of Commitment**

[Policy Statement](#)

[Purpose](#)

[Audience](#)

[Definitions](#)

[Policy Implementation](#)

- I. [Guiding Principles](#)
  - A. [Conflict of Commitment](#)
  - B. [Conflict of Interest](#)
- II. [Appropriate Use of University Resources](#)
- III. [Situations that May Create a Conflict of Interest or Conflict of Commitment](#)

## **Policy Statement**

Faculty and Staff have a primary professional obligation to act in the best interests of Northwestern; their primary professional commitment of time and intellectual energies is expected to be toward supporting the University's mission of education, research, and service. Considerations of personal gain from Outside Professional Activities or Financial Interests, as defined below, must not influence the decisions or actions of Faculty or Staff in performing their University responsibilities. This Policy outlines requirements for disclosure of Outside Activities and Financial Interests; educates Faculty and Staff about situations that generate Conflicts of Interest and Conflicts of Commitment; provides guidance to individuals and the University to manage or eliminate such conflicts; promotes the best interests of students and others whose work depends on Faculty and Staff direction; and describes situations that are prohibited.

## **Purpose**

Northwestern Faculty and Staff are expected to conduct the affairs of the University consistent with high ethical and legal standards and in a manner that will further the interests of the Northwestern community. As part of this responsibility, the University expects Faculty and Staff to apply their time and effort appropriately, to use University resources toward University ends, and to avoid any interaction that creates, or appears to create, a Conflict of Interest or Conflict of Commitment, as defined below. When the application or use of University time or resources results in inappropriate personal advantage, or is detrimental to the University's mission, that use of time or resources represents a conflict between one's interest and that of the University. Accordingly, this Policy establishes standards and requirements to protect the financial well-being, reputation, and legal obligations of the University. Furthermore, this

*Faculty:* for purposes of this Policy, any person possessing either a full- or part-time academic

Access to information collected in connection with this Policy will be limited to those with a need to







#### D. Financial Interests

Financial Interests create Conflicts of Interest when they provide, or appear to provide, an incentive or opportunity for a Faculty or Staff member to affect a University decision or other University activity for personal gain.

For purposes of this Policy,<sup>3</sup> “Financial Interest” is one or more of the interests defined below held by a Faculty<sup>4</sup> or Staff member and/or an Immediate Family Member, if the interest reasonably appears to relate to one’s Institutional Responsibilities:

1. With regard to any publicly traded Entity,



Financial Interests **DO NOT** include the following interests:

1. Salary, royalties, or other remuneration paid by Northwestern to the Faculty or Staff member if currently employed or otherwise appointed by the University;
2. Income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency; a qualifying institution of higher education; an academic teaching hospital; a medical center; or a research institute that is affiliated with a qu7 ( qu)10.9 (a) (te)31.9 (n)1yM13.3 (n)4 (t)10.2 (l)-0.6 (y)TJ0 n109 -1.2-ct4 0.2.9 (n)1yM1





approving or rejecting activities in which Faculty members propose to be engaged. School dean's offices are also expected to enforce the requirements and expectations of this Policy. Individual schools may have more, but not less, restrictive internal policies than those set forth by the University in this Policy.

Acceptance of social invitations to occasional

