The University of Georgia
Internal Auditing Division

Director – Matthew Whitley
The Question of “Conflicts of Interest”
Dealing with the matter of Trust
Each University System of Georgia (USG) employee shall make every reasonable effort to avoid actual or apparent conflicts of interest and also the appearance of a conflict of interest. An appearance of a conflict exists when a reasonable person would conclude from the circumstances that the employee’s ability to protect the public interest, or perform public duties, is compromised by a personal, financial, or business interest. An appearance of conflict can exist even in the absence of a legal conflict of interest. USG employees are referred to State Conflict of Interest Statutes O.C.G.A. § 45-10-20 through § 45-10-70 and institutional policies governing professional and outside activities.
What are the key points?

• “The appearance of a conflict of interest”
• “protect the public interest”
• “compromised by a personal, financial, or business interest”
Let’s define a few terms.

**Interest** – financial, reputational, work product, relationships

**Compromised** - in your official capacity your decision making is affected by personal consideration (self interest).
Practically, what does this mean for you?

• You cannot be on both sides of a transaction.

• You cannot do business with a family member or someone you are in a personal relationship with.

• You cannot compete with UGA or divert business away from UGA.

• You cannot work for a competitor of UGA without permission.

• You cannot use UGA assets for personal use or gain.

• You cannot use personal reasons to “create” business travel.

• You cannot work for someone else during your scheduled work time.
Other things to consider

- Outcome of the situation does not make it OK.
- Even if it is the best approach it is not OK.
- “I didn’t personally profit from it” is not acceptable.
- Your supervisor telling you it is OK is not OK.
- “UGA wasn’t able to provide these services” isn’t OK.
- If you have any questions ask someone.