

Conflict Management Plan for Conflicts of Interest – Resource Packet

The Universities of Wisconsin Office of Compliance and Integrity has created this conflict management plan resource which includes: an introduction for supervisors to developing a plan with an employee; an individual conflict management plan example template; and a follow up review of an individual conflict management plan example template.

Supervisors Introduction to Developing a Conflict Management Plan with an Employee

Collecting Information.

Supervisors are responsible for reviewing the information provided by employees that may identify conflicts of interest and providing guidance on how to proceed. Any time a supervisor is made aware of a potential conflict of interest, whether through receipt of an Outside Activities Report or through another means, the supervisor should meet with the employee to discuss and determine whether a potential conflict may exist. Per [UWS 8.025\(2\)\(b\)](#), each unclassified staff member engaging in outside activities... shall annually...file a report of outside activities..., but it is important to note that per [UWS 8.025\(2\)\(c\)](#) if, during the year, significant changes in a staff member's reportable outside activities occur, the staff member shall immediately inform, in writing, his or her dean, director or other appropriate administrator...

Determination.

The Supervisor may decide that no conflict exists (and the outside activity is permissible). Or the Supervisor may decide that a potential conflict or appearance of conflict does exist. If a conflict is identified, the Supervisor will work with the Employee to develop a Conflict Management Plan. The Supervisor may decide that the Employee should refrain from the activity all together.

Outside professional activities cannot create a conflict of commitment with an employee's UW System primary duties. As stated in [SYS 1290 Guidance](#), if an employee's aggregate time commitment to one or more outside professional activities will exceed an average of 16 hours per calendar month during hours that they would be normally on duty in their UW System position, they must receive prior written permission from their supervisor. Individual institutions or departments may impose stricter time limitations, reflecting the local needs and concerns. Supervisors are encouraged to have a written conflict management plan in place in circumstances that may give rise to a conflict of commitment.

Managing the Conflict.

The Conflict Management Plan will outline how the Employee's work can be managed to avoid a conflict, enhancing transparency by creating separation between the Employee's work at the institution and their outside activities. The plan should be developed by the Supervisor and the Employee. An example template of an Individual Conflict Management Plan is provided within this document. The plan template includes sections on information

and description; management plan actions; understanding, agreement, and approval; filing and monitoring the plan.

Filing and Monitoring the Plan.

The signed Conflict Management Plan should be filed with the Outside Activities Report form, as well as the institution's Office of Human Resources for the Employee's personnel file. The plan should then be reviewed regularly as described above.

Review of the Management Plan.

Written plans should be updated as situations and circumstances change, and the review of the Conflict Management Plan should continue until the conflict no longer exists. An example template for a Review of Individual Conflict Management Plan is provided within this document.

UW-INSTITUTION Individual Conflict Management Plan Template

The following Conflict Management Plan was developed by the Supervisor and the Employee. Prior to sitting down to develop this plan, the Supervisor and Employee each reviewed the available resources and information regarding conflicts of interest:

- [Regent Policy Document 13-4](#): Wisconsin System Policy on Institutional and Employee Relationships with Educational Loan Lenders (RPD 13-4)
- [Wis. Admin. Code § UWS 8.025](#)
- [Regent Policy Document 20-22](#): Code of Ethics
- Office of Compliance & Integrity [Ethics Information](#)
- [UW System Administrative Policy 1290](#), Code of Ethics
- Institutional Policy and or Procedure

Information and Description.

Name of Employee: _____

Employee's Position Title: _____

Employee's Department: _____

Name of Supervisor/Manager: _____

Supervisor's Position Title: _____

Supervisor's Department: _____

What is the type of activity/interest/relationship that creates an actual/perceived/potential conflict? *(report anything that might qualify as an outside activity, regardless of whether remuneration is received or not; as described on the OAR - remunerative relationships such as consulting, research, teaching, or writing; offices and directorships; ownership interests; foreign activities; indicate whether remuneration is received or not, as well as the time commitment)*

Describe the nature of the conflict and the Employee's level of involvement. *(accurate explanation of the actual/perceived/potential conflict; relationship of the potential conflict to the institution; potential impacts of the employees work at the institution; additional information on the situation as it exists or its history)*

Management Plan Actions.

How will the work of the Employee be managed (or eliminated) to avoid the conflict?

Describe the measures and strategies that will be put in place to mitigate and protect against the conflict. *(time and effort commitments; how the Employee assures that their institutional responsibilities will be accomplished; restrictions placed on the Employees work with the institution; restrictions on the Employee's involvement with the outside activity; etc. Examples: removing self from discussions, involvement, and decisions on certain matters; acting in a supervisory role to specific employees.)* What will be specifically monitored within the management plan? *(Facilitating oversight in monitoring the plan to ensure the safeguards are*

followed. Example: early review of the plan due to the conflict changing from a potential conflict to an actual conflict.).

Understanding, Agreement, and Approval.

This Conflict Management Plan was developed by the Supervisor and Employee and was approved by the designated Approver. By signing this agreement, the Employee acknowledges that UW-**INSTITUTION** will monitor and evaluate this management plan and relevant policies. If at any time the institution decides this plan is not sufficient to manage the conflicts or is not in the best interest of the institution, the institution may determine the conflict is not capable of a management plan. At that time, the Employee may be asked by a designee of the institution not to continue involvement in the outside activity causing the conflict, while employed at UW-**INSTITUTION**. The Conflict Management Plan will be in effect until the activity/interest/relationship changes.

Date Management Plan was developed: _____

Date Management Plan will be reviewed (or earlier if the situation changes): _____

(at minimum, one review should be conducted prior to the annual April OAR)

Employee:

Signature

Date

Supervisor:

Signature

Date

Plan Approved by: *(designated approver could be the supervisor's supervisor, division vice chancellor/administrator, etc.)*

Printed Name

Position Title

Signature

Date

Filing and Monitoring the Plan.

The signed Conflict Management Plan will be filed with the Outside Activities Report form, as well as the UW-**INSTITUTION**'s Office of Human Resources for the Employee's personnel file. Next steps include the Employee and Supervisor reviewing the plan regularly as described above.

UW-**INSTITUTION** Review of an Individual Conflict Management Plan **Template**

Review of the Management Plan.

Describe the current state of the conflict. Does the actual/perceived/potential conflict still exist?

If Yes:

Describe the continued measures and strategies that will remain or be put in place to mitigate and protect against the conflict. How will the work of the Employee continue to be managed (or eliminated) to avoid the conflict?

Date Management Plan will be reviewed next: _____

If No:

Describe how the conflict was resolved.

Date Management Plan was concluded: _____

Employee:

Signature

Date

Supervisor:

Signature

Date

Review Approved by:

Signature

Date

Filing and Monitoring the Plan.

The signed Review of an Individual Conflict Management Plan will be filed with the Outside Activities Report form, as well as the UW-**INSTITUTION**'s Office of Human Resources for the Employee's personnel file.