NEPOTISM AND PERSONAL RELATIONSHIPS IN EMPLOYMENT POLICY

Policy Summary

It is the position of the university that all employees and applicants for employment be evaluated on the basis of individual merit, professional qualifications and performance, and be treated fairly during their employment. To ensure that personal relationships between employees do not materially interfere with or disrupt the university’s operations or jeopardize the working relationships of university employees, the university has established a policy that governs employment relationships between members of the same immediate family, members of the same household, or individuals in personal relationships. Generally, a university employee may not influence decisions related to the recruitment, hiring or terms and conditions of employment of a person who is a member of the employee’s immediate family, with whom he or she shares a household, or with whom he or she has a personal relationship.

Who is Governed by this Policy

Faculty and staff.

Policy

The employment of members of the same immediate family, of those who share a household, or of those with other types of personal relationships may create conflicts of interest or the perception of conflicts of interest. The university will use sound judgment in the placement of such employees in accordance with the following guidelines:

A. Members of the same immediate family, same household, or those involved in a personal relationship, (hereinafter referred to as “related party” or
related parties”) are prohibited from having a direct reporting or supervisor-to-subordinate relationship subject to paragraph B below. No individual should have decision-making authority or significant influence over the hiring, performance evaluation, work responsibilities, salary, hours, career progress, benefits or other terms and conditions of employment of a related party.

B. Individuals who become a related party to a GW employee within the same school or division while already employed at the university must promptly report that fact to each employee’s Human Resource Management and Development ("HRMD") representative. If there is a direct reporting relationship or a supervisor-to-subordinate relationship between the parties, the person in greater authority shall promptly disclose the relationship to their HRMD representative. Further, the person in greater authority shall promptly disclose to their HRMD representative the existence of any former related party relationship (e.g. former spouse) with an employee in a position of lesser authority. If in the opinion of the university, the relationship potentially violates this policy, the Vice President for Human Resource Management and Development (“VP”) or designee, in consultation with other university staff as appropriate, will implement appropriate remedial measures or management plans to minimize the conflict of interest or appearance thereof, which may include recusal of the person in greater authority, transfer of an employee, or termination of employment. If one or both individuals are faculty, the VP will promptly inform the dean or highest authority in the faculty members’ school or division1 of the relationship, who shall also approve any management plan established. The HRMD representative (and, if one or both of the individuals are faculty, in consultation with the dean or highest authority in the applicable school(s) or division(s)) will regularly monitor compliance with any management plan established and document any such plan. The plan will also be centrally maintained by the Division of Human Resource Management and Development (and in cases involving faculty, with the Office of the Vice Provost for Faculty Affairs).

If an applicant is otherwise qualified and might be selected for an available position but is a related party or former related party to an existing GW employee in the same department, the selecting authority must consult with their HRMD representative (and if the application is for a faculty position, with the Vice Provost

1 If one of the related parties is the dean of a school, then the VP will inform the Provost. If one of the related parties is the Provost, the VP will inform the President. If one of the related parties is the President, the VP will inform the Chair of the Board of Trustees.
for Faculty Affairs) on the applicability of this policy before completing the hiring process.

C. Violations of this policy (e.g., a failure to report a related party relationship subject to this policy and/or a violation of any management plan established) may subject the violator to disciplinary and/or corrective action. The university may take interim steps to manage or address the violation prior to taking disciplinary action, including but not limited to recusal of the person in the position of greater authority. The disciplinary and/or corrective action will depend on the particular circumstances of the violation, including but not limited to whether the person in the position of greater authority promptly reported the related party relationship, and may include additional training, counseling, a written warning, suspension, or termination of employment.

D. Nothing in this policy prohibits a member of the university community from bringing a complaint under the university’s Sexual and Gender-Based Harassment and Interpersonal Violence Policy, if, for example, the individual believes that a personal relationship was not welcome or consensual. Further, in cases where there is a finding under the Sexual and Gender-Based Harassment and Interpersonal Violence Policy that a relationship was welcome or consensual, an investigation and appropriate action may still be taken for violations of this policy.

E. Individuals who are, were, or may be related parties and who have questions about this policy or wish to consult with university personnel are encouraged to contact their HRMD representative.

Definitions

**IMMEDIATE FAMILY:** Mother, father, child, sister, brother, spouse, any step-relation, domestic partner, grandparent, uncle, aunt, and cousin, and in-law of the same relation as any of the foregoing.

**HOUSEHOLD:** Anyone with whom the employee shares a house, apartment, or other similar living arrangement.

**PERSONAL RELATIONSHIP:** Showing, expressing, or relating to sexual interest or intimacy or physical relations, or other relationship in which there is a strong personal bond between individuals, not including solely professional relationships (e.g., colleagues, professional organization members, co-authors, co-grantees, etc.).
Related Information

Conflict of Interest Policy for Non-Faculty Employees
Conflict of Interest Records Entry Policy
Sexual and Gender-Based Harassment and Interpersonal Violence Policy

Contacts

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<tr>
<th>Contact</th>
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<tr>
<td>Human Resource Management and Development</td>
<td>202-994-9610</td>
<td><a href="mailto:askhrmd@gwu.edu">askhrmd@gwu.edu</a></td>
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Reporting of non-compliance with this policy can be done through the Office of Ethics, Compliance, and Privacy website.