Title: Employment of Related Persons (Anti-Nepotism) Policy Standard Operating Procedure

PRR: Employment of Related Persons (Anti-Nepotism) Policy; appointment; recruiting; hiring

Authority: Associate Vice Chancellor for Human Resources

[Signature]
Kitty H. Wehrenberg 1/22/2018

(Approval Signature, Printed Name, and Date)

History: This Standard Operating Procedure was created in order to outline the process by which Related Persons are captured and subsequently reported to the Board of Trustees.

Related Policies: NC Office of State Human Resources Selection Policy; UNC General Administration Employment of Related Persons Policy; UNC General Administration Guidelines on Implementing Anti-Nepotism Policy; Policy of the Board of Governors of the University of North Carolina Concerning Improper Relationships between Student and Employees; UNC General Administration Policy on Conflict of Interest and Commitment

Additional References: Faculty Spousal and Domestic Partner Hiring Standard Operating Procedure; N.C. Gen. Stats. Sec. § 138A-40

Contact for Info: Director of Employment and Clinical Support Services, Department of Human Resources Phone: 252.328.9847 or 252.328.9897

1. Introduction
   The Employment of Related Persons Standard Operating Procedure (SOP) serves to ensure compliance with the Employment of Related Persons (Anti-Nepotism) Policy. Based on the policy, the University is required to evaluate situations in which two (2) or more individuals who are involved in a familial or amorous relationship may be concurrently employed at the University. Additionally, the SOP supports required annual reporting by the Chancellor (via the Department of Human Resources) to the Board of Trustees.

2. Covered Positions
   This SOP applies to all position types, to include: EHRA Faculty, EHRA Non-Faculty, SHRA, and CSS.
3. Outline of Related Persons Documentation Processing

3.1. UNC General Administration (UNC-GA) requires all EHRA Faculty and EHRA Non-Faculty employees to complete and submit conflict of interest (COI) disclosures annually.

3.2. UNC-GA, the Office of State Human Resources (OSHR), and ECU Policy requires all employees (EHRA Faculty, EHRA Non-Faculty, SHRA, and CSS) to report situations where they are involved in a situation that is defined in any of these policies.

3.3. UNC-GA and ECU policy also requires the submission of notices of intent to engage forms by EHRA Faculty and EHRA Non-Faculty employees engaging in external professional activities for pay.

4. Definitions

4.1. Related Persons -- Identified in the ECU and UNC policies specified above.

4.2. Management Directive -- Written documentation issued to EHRA Employees and Graduate Assistants, within the Academic Affairs division, who are identified as related by the policy definition and who are concurrently employed in the same academic unit/other organizational structure or a different academic unit/organizational structure within ECU.

4.3. Management Plan -- Written documentation issued to the both employees to ensure a work environment where employees can be objectively supervised and evaluated.

5. Procedures for Annual Reporting

5.1. The department of Human Resources provides all University divisions, via a Human Resources representative, with the Related Persons Questionnaire and the template listing of known relationships for the division staff to revise and update as appropriate.

5.2. Where a new relationship is disclosed, the Related Persons Questionnaire must be completed and submitted to Human Resources.

5.3. The department of Human Resources will issue a management plan when needed for SHRA, CSS, and EHRA Non-Faculty related persons. The department of Human Resources will also issue a management plan if a related persons situation involves one EHRA Faculty member.

5.4. The department of Human Resources advises all division offices of any relational situations identified as being covered by the Employment of Related Persons (Anti-Nepotism) Policy, regardless of employment type. The division offices are consulted to determine the need to implement a management plan.

5.5. In related persons situations involved two (2) EHRA Faculty members, the appropriate division office will issue a management plan.

5.5.1. The Office of the Provost will take the lead in determining the need for and implementing a management directive or management plan for two (2) EHRA Faculty related persons working in the division of Academic Affairs.

5.5.2. The Health Sciences Human Resources office will take the lead in determining the need for and implementing a management plan for two (2) EHRA Faculty related persons working in the division of Health Sciences.

5.5.3. All actual/potential conflict of interest created by amorous or familial relationship shall be disclosed to the department of Human Resources and the appropriate Vice Chancellor or Chancellor if EHRA employees are involved.
5.6. Additionally, the Office of Research Integrity and Compliance (ORIC) shares related persons identified through the conflict of interest disclosure process with Human Resources on a quarterly basis. Any new disclosures of relationships not previously known will be handled as stipulated in Section 5.2-5.5.

5.6.1. The conflict of interest disclosure form asks individuals to provide full names as well as the nature of the relationship, including the department and/or unit, when indicating affirmatively to “Are you related to, have immediate family, or are you in an amorous relationship with anyone at ECU?”.

5.7. ORIC will only draft management plans for related persons where both persons conduct research together. These plans will be reviewed by the department of Human Resources before being finalized.

5.8. All related persons with potential for conflict of interest are shared with the ORIC.

5.9. The department of Human Resources then reviews the relationships reported from ORIC and the division offices. The relationships that require reporting to the Board of Trustees are compiled on a single spreadsheet.

6. Employee Disclosures

6.1. When a candidate is hired (SHRA, CSS, EHRA Faculty, or EHRA Non-Faculty), to include movement into a new position, they are required to disclose any blood, marriage, or other close personal relation to any persons currently employed at ECU.

6.2. The Related Persons Questionnaire is completed as appropriate in these situations. The department of Human Resources reviews the questionnaires and provides guidance as stipulated in section 5.

6.2.1. The review is completed by members of the department of Human Resources Employment Unit in conjunction with the department of Human Resources Employee Relations unit.

6.2.2. Once a management plan has been drafted, the immediate supervisors have the opportunity to review and provide feedback.

6.2.3. The applicable department chair or administrator is advised and may also review and provide feedback on the management plan.

6.3. The department of Human Resources requests that each division contact employees on an annual basis, providing the Related Persons Policy information and allowing the opportunity to self-disclose any changes in status to related persons.

Contact Information & Additional Resources:
Director of Employment and Clinical Support Services, Department of Human Resources
Phone: 252.328.9847 or 252.328.9897

Office of Research Compliance Administration, Office of Research Integrity and Compliance
Phone: 252.328.9473

Office of Personnel Administration, Academic Affairs Division
Phone: 252.238.2587 or 252.328.4787
Operations, Planning and Compliance Management Office, Administration and Finance Division
Phone: 252.328.5629

Health Sciences Human Resources, Health Sciences Division
Phone: 252.744.1910

Office of Administrative Services, Research, Economic Development & Engagement Division
Phone: 252.328.9478 or 252.737.1916

Business Administration Office, Student Affairs Division/Chancellor’s Division
Phone: 252.328.1409

Business Office, University Advancement Division
Phone: 252.328.9567

Administration, Athletics Division
Phone: 252.737.2331