

## Purpose:

The National Institutes of Health is committed to a work environment that is collegial, respectful, and productive. The purpose of this policy statement is to promote a positive work environment that is free from relationships that cause a real or perceived conflict of interest.

## Policy:

Personal relationships (including romantic and/or sexual) between individuals in inherently unequal positions, where one party has real or perceived authority over the other in their professional roles, may be inappropriate in the workplace and are strongly discouraged. If such a relationship exists or develops, it must be disclosed. This applies to all individuals in the NIH community, including employees, contractors, students, trainees, and fellows and includes anyone who holds a position of authority or perceived authority over another individual from a scientific or administrative perspective.

## Definition of an Inappropriate Personal Relationship:

- Relationships between persons in inherently unequal positions where one party has real or perceived authority, influence, or power over the other's conditions of employment or has the ability to directly impact the other's career progression, which includes formal and informal supervisory relationships<sup>1</sup>.
- Such relationships are inappropriate if they have an actual, perceived, or potential for perceived influence over the professional relationship or workplace.

Efforts by either party to initiate or engage in these relationships is inappropriate. These relationships, even if consensual, may ultimately result in conflict or difficulties in the NIH workplace. This excludes relationships where one party **does not** have real or perceived authority or influence over the other's condition of employment or the ability to directly impact the other's career progression.

## Disclosure Requirement:

Disclosure of such relationships creates a transparent environment that ensures the mission is met with mutual professional respect and accountability while also maintaining public trust and avoiding conflict of interest.

- If individuals of unequal authority are in this type of relationship, the party of greater power is prohibited from engaging in all official matters affecting or appearing to affect the other and both must immediately disclose it to their supervisor (or any supervisor in their chain of command).
- Disclosure reduces the risk to both parties, as measures can be taken immediately to mitigate real or perceived conflicts of interest and bias.
- A failure to disclose such a relationship may result in disciplinary action.

## **Remediation:**

Upon such notification the responsible agency official must ensure that the Institute/Center manages, decreases, or eliminates potential risk as a result of the relationship. Appropriate action may include, but is not limited to:

- Reassignment of one party to sever the supervisory relationship
- Recusal of the supervisor or individual in the position of authority or perceived authority from all official matters affecting, or appearing to affect, the subordinate
- Administrative inquiry into the matter to determine if any inappropriate action(s) occurred as a result of the relationship, which could result in administrative action, including disciplinary action. Such findings may also be considered when making administrative decisions to include funding, staff, and resources.

ICs are required to report the number of disclosed relationships and the remediation actions taken to Civil on a quarterly basis.