

**POLICY:** Conflict of Interest  
**BOT APPROVED:** December 17, 2021, April 28, 2023  
**ADOPTED:** December 17, 2021  
**REVIEWED:** March 2023

## **I. POLICY STATEMENT**

North Country Community College (NCCC), sponsored by Essex County and Franklin County, is part of the State University of New York (SUNY) system. The establishment of personnel policies is the responsibility of the North Country Community College Board of Trustees, while ensuring compliance with those policies is the responsibility of the College administration. We maintain and affirm that the most equitable and fair policies are those that involve shared governance, and we are committed to engaging the College community in the development/modification of established policies wherever possible. This policy follows that process.

The College community embraces and values accountability, integrity and transparency in our personal and collective conduct, and takes seriously the public's trust that is placed upon us. In that spirit, it is the policy of North Country Community College that the College, and its affiliated organizations, conducts its business by conforming to the highest ethical, professional and legal standards. Furthermore, all employees and members of the College community, and affiliated organizations, shall avoid any and all circumstances/behavior that could be reasonably interpreted as a conflict of interest.

## **II. SCOPE**

The policy applies to all full-time and part-time employees of the College, and those affiliated groups which support it, including the members and employees of the NCCC Association and the NCCC Foundation. The Board of Trustees is governed by a separate policy.

## **III. POLICY**

It is the policy of North Country Community College that the College, and its affiliated organizations, conducts its business by conforming to the highest ethical and legal standards. Furthermore, all employees and members of the College community and its affiliated organizations, shall avoid all circumstances/behavior that could be reasonably interpreted as a conflict of interest.

Guided by values of accountability, integrity and transparency, members of the College community shall not intentionally place the College's integrity or reputation at risk by participating in illegal activities and/or highlighting their relationship with the College when engaged in any political activities.

In order to avoid a conflict of interest or the appearance of a conflict of interest, all employees of the College and affiliated organizations shall adhere to the following guidelines:

- Employees of the College shall not have any pecuniary interest, directly or indirectly, proximately or remotely, in selling any goods, wares or like merchandise to the College.
- Employees of the College shall not solicit or accept any gift, favor, or other benefit, either directly or indirectly, for reward or promise of reward for influence in recommending or procuring any merchandise or service for the College.
- Employees of the College shall not use confidential and/or privileged information

acquired as a result of their involvement at the College for personal gain for themselves or others.

- Employees of the College shall comply with the New York State Public Officers Law provisions on conflict of interest and ethical conduct, and all applicable laws or codes regarding ethical conduct.
- Employees of the College shall remain committed to fostering an atmosphere of academic freedom by promoting the open and timely exchange of scholarly knowledge, independent of their personal or political leanings or interests.
- Employees of the College shall not engage in other employment which conflicts with the performance of their employment obligations to the College.
- Employees of the College, to the extent required by law or regulation, shall disclose at minimum whether they (and their spouses and dependent children) have employment or financial interests or hold significant offices, in external organizations that may affect, or appear to affect, the discharge of professional obligations to the College.

#### **IV. DEFINITIONS**

Conflict of Interest is defined as engagement in any outside business, financial, and/or political activity which directly or indirectly conflicts with the interests of the College and/or interferes with the ability to fully perform one's job duties.

#### **V. GUIDELINES**

Any employee or member of the College community that is uncertain about this policy or its expectations, and/or has concerns that their actions could be viewed as a conflict or a potential conflict of interest, are advised to consult with the Director of Human Resources, one of the senior administrators at the College, or the Chair of the Board of Trustees. Failure to comply with this policy and these guidelines, depending on the circumstances, could result in disciplinary action, up to dismissal if warranted.

#### **VI. SOURCES/RESOURCES**

A number of resources, including General Municipal Law Article 18 and New York State's Public Officers Law, Section 73 and Section 74, define and address conflict of interest as well as outline standards for ethical behavior on the part of employees of the College.

- NYS Public Officers Law Section 73  
[https://ag.ny.gov/sites/default/files/pdfs/bureaus/public\\_integrity/public\\_officers\\_law\\_sec\\_73.pdf](https://ag.ny.gov/sites/default/files/pdfs/bureaus/public_integrity/public_officers_law_sec_73.pdf)
- NYS Public Officers Law Section 74  
[https://ag.ny.gov/sites/default/files/pdfs/bureaus/public\\_integrity/public\\_officers\\_law\\_sec\\_74.pdf](https://ag.ny.gov/sites/default/files/pdfs/bureaus/public_integrity/public_officers_law_sec_74.pdf)
- General Municipal Law – Article 18. Conflicts of Interest of Municipal Officers and Employees  
[https://ag.ny.gov/sites/default/files/pdfs/bureaus/public\\_integrity/article\\_18.pdf](https://ag.ny.gov/sites/default/files/pdfs/bureaus/public_integrity/article_18.pdf)
- SUNY Conflict of Interest Policy  
[https://www.suny.edu/sunypp/documents.cfm?doc\\_id=527](https://www.suny.edu/sunypp/documents.cfm?doc_id=527)