

NORTH COUNTRY COMMUNITY COLLEGE BOARD OF TRUSTEES CONFLICT OF INTEREST POLICY

The Board of Trustees of North Country Community College recognizes a shared responsibility to ensure that they conduct themselves in an unbiased manner and serve the goals of the College. It is thus the responsibility of each member of the Board to guard against conflicts of interest that might compromise the integrity and objectivity perception by the College community.

It is the policy of the Board of North Country Community College that:

1. Members of the Board shall not participate in institutional decisions involving direct benefits such as appointments, retentions, promotions, contracts or awards for themselves or members of their immediate families.
2. Members shall not have a direct or indirect interest in any business enterprise that has dealing with the College. Members in a position to influence a College business decision for which he/she may receive material benefit should disclose the nature of the conflict, and, where possible remove himself/herself from involvement in the decision.
3. Members shall not seek nor receive, for personal or any other person's gain, any payment, whether for services or otherwise, loan, gift or discount of more than nominal value, or entertainment that goes beyond common courtesies usually associated with accepted business practice from any enterprise that conducts business with the College or has current or known prospective dealings with the College.
4. Members shall not, for personal or any other person's gain, deprive the College of any opportunity for benefit that could be construed as related to any existing or reasonably anticipated future activity of the College.
5. Members shall not, for personal or any other person's gain, make use of or disclose confidential information learned as a result of membership on the Board.
6. Members shall not interfere or act individually to influence or impact the College relationship and/or procedures with the sponsoring Counties or their Legislation. "Legislation" means a matter which appears on the agenda of the County Legislature or Board of Supervisors or on a committee thereof, on which any official action will be taken and included proposed or adopted acts, local laws, ordinance or resolutions.

7. Members shall not act in any way or manner that is injurious to the administration of the College or the Board of Trustees.

8. Members shall not act or be involved in any situation that potentially conflicts with the principle that this policy is intended to implement and a Member shall endeavor to pursue a course of conduct which will not raise suspicion among the public that he or she is likely to be engaged in acts that are in violation of trust. Further, the Board of Trustees of North Country Community College recognizes that New York State General Municipal Law, Article 18 (§800et seq.) contains provisions of law relative to conflicts of interest of municipal officers and employees (see General Municipal Law, §800 [4] [5]).

**NORTH COUNTRY COMMUNITY COLLEGE
CONFLICT OF INTEREST STATEMENT
For
BOARD OF TRUSTEES MEMBERS**

The standard of behavior for the Board of Trustees of North Country Community College is that all members scrupulously avoid conflicts of interest. This standard involves the avoidance of potential and actual conflicts of interest and perceptions that conflicts of interest may exist.

To protect the integrity of the decision-making process of the Board of Trustees, and ensure that our constituents have confidence in the integrity of the Board, I, as a member of the Board of Trustees, will make a full disclosure of interests, relationships, holdings, and acts that could potentially result in a conflict of interest.

During any decision-making process, I will disclose any interest in a transaction or purchase where I, including my business or other non-profit affiliates, my family, my employer, or close associates, may receive a financial benefit or gain. After disclosure, I understand that I will abstain from voting on any action to be taken regarding said transaction or purchase.

Signature of Trustee

Date

As adopted by the Board of Trustees on November 20, 2012.



NCCC Board of Trustees Approved Policy

POLICY: Conflict of Interest
DRAFTED: November 22, 2019
ADOPTED: December 2019

I. POLICY STATEMENT

North County Community College, sponsored by Essex County and Franklin County, is part of the State University of New York (SUNY) system. The establishment of policies is the responsibility of the North Country Community College Board of Trustees, while assisting in the application and 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, including the Board of Trustees, 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, the Board of Trustees and those affiliated groups which support the College, including the members and employees of the North Country Community College Association and the North Country Community College Foundation.

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, professional and legal standards. Furthermore, all employees and members of the College community, including the Board of Trustees and affiliated organizations, shall avoid any and all circumstances/behavior that could be reasonably interpreted as a conflict of interest.

In addition to being informed by our aforementioned values of accountability, integrity

and transparency, a guiding principle is that 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 to the College when engaged in any political activities.

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

- Neither members of the Board of Trustees nor employees of the College shall have any pecuniary interest, directly or indirectly, proximately or remotely, in supplying any goods, wares or merchandise of any nature or kind whatsoever to the College.
- Neither members of the Board of Trustees nor employees of the College shall 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.
- Neither members of the Board of Trustees nor employees of the College shall use confidential and/or privileged information acquired as a result of their professional activity at the College for personal gain for themselves or others.
- Members of the Board of Trustees and employees of the College are expected to 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
- The faculty and staff of the College are supported in 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 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. REPORTING PROCEDURES AND RESPONSIBILITIES

If any employee or member of the College community is uncertain about the policy or its expectations, and/or has concerns that their actions could be viewed as a potential conflict of interest, they are advised to consult with their immediate supervisor, or one of 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 dismissal or other disciplinary action.

A number of resources, including 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.

VI. INVESTIGATION AND RESPONSE PROCEDURES

VII. SANCTIONS