

responsible for the employee(s) potentially involved in the conflict. This form may be submitted anonymously. For non-anonymous submissions, the identity of the person reporting the conflict will be kept confidential to the extent compatible with an adequate investigation.

It is a violation of this policy to retaliate against an individual who reports a potential or perceived conflict of interest. If an individual believes that retaliation has occurred or that he or she has been threatened, he or she should report it immediately to Human Resources. It is also a violation of this policy for an employee to file a Disclosure Form in bad faith or give a statement in bad faith.

In the case of a potential conflict of interest involving one or more other employees, the employee also may make a sworn complaint to the state ethics commission alleging a violation of section 73 (Business or Professional Activities by State Officers and Employees and Party Officers), 73-a (Financial Disclosure), or 74 (Code of Ethics) of the Public Officers Law. The complaint mechanism is described in Executive Law, Section 94(12).

PROCEDURES

The College shall make this Conflict of Interest and Professional Ethics Policy readily available and shall communicate it at least annually to all employees. New employees are to be given a copy of this policy.

Upon receiving a Conflict of Interest Disclosure Form, the Vice President shall render a decision on the matter after a full and fair investigation. The due process rights of all persons involved, including the right to a hearing, shall be respected at all times.

An employee affected by a resolution or decision may appeal to the President by submitting a written statement explaining the disagreement. After a full and fair investigation, in which the same due process rights of all persons involved will be respected, the President shall issue a final decision. The employee may also appeal to the state ethics commission.

In general, all Conflict of Interest Disclosure Forms are to be retained for four years. Where grants are involved, all related documents must be retained for at least three years beyond the termination of the grant and for at least three years beyond the resolution of any related action with the granting organization.

Possible conflicts of interest involving senior management are to be resolved by the President in consultation with SUNY legal counsel.

Possible conflicts of interest involving the President are to be resolved by the Chancellor.