

Manual of Policy and Procedures

Title EMPLOYEE CONFLICT OF INTEREST POLICY	Number 210	Page 1 of 3
	Date 5/26/16	

POLICY STATEMENT:

To ensure continued confidence of Vermonters in the Vermont State Colleges (hereinafter VSC) and its personnel, individuals serving the VSC shall at all times act in a manner consistent with their public responsibilities and shall exercise particular care to avoid any real or

Awards, in addition to the provisions above.

PROCEDURES:

Disclosure and Consultation: The following procedures apply except in situations where a procedure is otherwise provided by a collective bargaining agreement. President and, for employees not employed directly by one of the member institutions, the Chancellor shall develop a procedure for disclosure and consultation with the following parameters:

1. If an employee believes that he or she may have a conflict of interest, the employee shall promptly and fully disclose the conflict to the appropriate administrator (the Chancellor, the President or their designee) and shall refrain from participating in any way in the matter to which the conflict relates until the conflict question has been resolved.
2. When it appears that a material conflict may arise between the personal interest of an employee and his or her responsibilities to the VSC, the employee shall notify the appropriate administrator by submitting a written statement describing the nature of the possible conflict. If an apparent conflict comes to the attention of the administrator, that individual may request a written statement from the employee.
3. If an employee is in doubt as to whether he or she is confronted with a potential conflict of interest, the employee shall consult with the appropriate administrator to determine if the outside interests could conflict impermissibly with the employee's obligations to the VSC.
4. The appropriate administrator promptly shall notify the employee in writing that (a) there is no conflict and the employee may proceed; or (b) there may be a conflict and further consultation is necessary prior to reaching a determination; (c) there is a conflict and the employee shall not proceed with his or her personal interest which results in the conflict; (d) there is a conflict but either the conflict is insubstantial or cured by the disclosure or it is determined that after full disclosure the VSC's interests are best served by participation of the employee despite the conflict appearance of conflict.
5. The employee may appeal the administrator's decision to the President (Chancellor for Chancellor's Office employees or employees of programs not affiliated with a member institution).
6. The employee must report any significant changes in outside interest that occur during the year and consult with the appropriate administrator if the undertaking of a new outside interest is considered to the extent such significant change or undertaking would create an actual or perceived conflict of interest.

7. Any VSC employee who is aware of an unreported conflict of interest or appearance of a conflict on the part of another VSC employee, without fear of reprisal, shall report that information to an appropriate administrator.
8. Any significant violations of this policy shall be reported to the Chancellor or President.

GENERAL PROVISIONS