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<b>Policy Number:</b>	1.2.001
<b>Title:</b>	<i>Conflict of Interest</i>

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### **Purpose**

To provide a framework to reduce or eliminate conflicts of interest in the delivery of instruction and curriculum development, College-related activities, and the expenditure of institutional resources. To protect the credibility and integrity of the College faculty and staff, to ensure public trust and confidence in the services provided and activities sponsored by the College. To outline standards for identifying and managing actual or potential conflicts of interest to ensure that decisions are made in the best interests of the College and its community. To maintain transparency, ethical standards, and trust within the institution and with its stakeholders.

### **Scope**

- This policy applies to all Thaddeus Stevens College of Technology (TSCT) employees, trustees, contractors, and any individual or entity acting on behalf of the College, hereafter referred to as “Interested Party.”
- This policy governs situations where personal, financial, or other external interests may conflict with TSCT’s interests or otherwise violate Pennsylvania’s Ethics Act or other applicable federal, state, or local laws. This policy also pertains to family members as per the Pennsylvania Ethics Act.

### **Definitions**

An actual or perceived conflict of interest exists when personal interests, relationships, or activities outside TSCT may improperly influence, or appear to influence, an Interested Party’s duties or decisions on behalf of the College. A potential conflict of interest occurs when an Interested Party’s private interests and professional obligations to the College diverge such that an independent observer might reasonably question whether the individual’s professional actions or decisions are determined by considerations of personal gain, financial gain, or otherwise. By way of example and without limitations, such divergence includes:

- **Financial Conflicts:** Personal investments, financial gain, or interest in a company that does business with TSCT; Use of College facilities and/or resources; Use of College facilities and/or resources for private enterprise without fair compensation to the College or prior administrative approval; acceptance of money, goods, or any other form of gratuity that may be related to an existing or potential contract for goods or services with the College.

- **Family Relationships:** Supervising or making decisions that affect a family member or relative within TSCT. Pursuant to the Pennsylvania Ethics Act, restricted conduct also includes outside activity with family members that may be viewed as seeking or accepting improper influence on an Interested Party's official duties or decisions related to the College.
- **Outside Employment:** Working for or consulting with entities that either conflict or have the potential to conflict with TSCT's interests or compete for resources.
- **Gifts and Favoritism:** Accepting substantial gifts, favors, or benefits from vendors, contractors, or any individual or entity seeking to influence TSCT decisions.

## Policy Detail

The College recognizes that participation with other organizations can be beneficial in terms of an Interested Party's personal and professional development. This policy is not intended to discourage individuals from participating with other nonprofit organizations or engaging in other employment. It is understood that not all such participation or outside employment will result in a conflict of interest.

The existence of actual or potential conflicts of interest may be complex and involve many different considerations. Some actions giving rise to conflicts of interest are prohibited by federal or state law. Others may be inherently unethical. Even absent any actual or unintended wrongdoing, situations giving rise to an actual or potential conflict must be assessed, the facts and circumstances of each particular case. However, Interested Parties must bear in mind at all times the importance of avoiding conflicts of interest or the perception of a conflict in handling personal and family affairs as they may relate to their duties to the College.

A conflict exists when an Interested Party has a personal or financial interest on both sides of a transaction and stands to personally gain upon the results of the transaction to the potential detriment of the College. Direct or indirect participation by an Interested Party or a member of their immediate family in any arrangement, agreement, investment, employment, consultation contract or other activity which could result in personal benefit at the expense of the College's interest must be avoided. In addition, a conflict exists when, due to an Interested Party's relationship with another business entity, there is a question as to whether that person can act solely and totally in the best interest of the College without undue influence or consideration of personal gain.

The following are examples without limitation, of situations that must be disclosed as they arise:

- Accepting a leadership or fiduciary position in an organization which competes with or is a potential competitor of the College.
- Engaging in outside employment either for compensation or gratuitously in violation of the College's Supplemental Employment Policy.
- Entering into a business relationship with another person or business entity that may cause the disclosure of information considered confidential or proprietary to the College.

- Engaging in an outside business relationship that require personal time or commitment that negatively impacts or otherwise compromises the performance of College duties and responsibilities.
- Utilizing College property, facilities, services, staff, and/or equipment for private teaching, consulting and activities for personal gain without prior administrative approval.
- Failing to assign appropriate credit and recognition to the College for any intellectual property, design, technique/service, program or the like that advances the success of an outside entity and which was developed in the course of College employment and/or the use of College resources.
- Entering into a business relationship with any person or business entity providing goods or services to the College, such as a consultant or a vendor.
- Using position as an employee or trustee to benefit personally or financially at the expense of the college.
- Accepting gifts from clients, vendors, etc., except for those of low value (i.e. candy, coffee mugs, meals, office supplies) consistent with common business courtesies.
- Extending excessive entertainment to or accepting it from a client, vendor or other person or entity doing business with or wishing to do business with the College.

Any Interested Party who anticipates any potential conflict of interest or who is in doubt regarding whether a situation creates an actual or potential conflict must disclose using the procedure described below. Failure to disclose a conflict of interest is a violation of this policy and may result in disciplinary action, up to and including termination. Interested Parties must recuse themselves while any potential conflict is under review or after a conflict has been established but the Interested Party remains employed or on the Board, etc.

## Procedure

### I. Disclosure and Reporting Requirements

- Initial Disclosure:** All Interested Parties are required to complete a Statement of Financial Interest form required by the Pennsylvania State Ethics Commission upon hiring or appointment. Thereafter, employees and trustees are required to update and submit the form on an annual basis.
- Ongoing Disclosure:** Interested Parties must promptly disclose any actual or potential conflicts of interest as they arise, using the Statement of Financial Interest Disclosure Form provided by the Vice President of Finance and Administration's Office.
- Annual Certification:** In conjunction with the annual submission of the Statement of Financial Interests form, Interested Parties must confirm annually that they understand the form as well as College Policy, and their obligation to disclose any existing conflicts.

### II. Review and Management of Conflicts

- Review:** Statements of Financial Interest form will be collected and reviewed by the VP Finance and Administration (VPFA). All disclosures will be routed to the

President or their designee for further review and consideration of possible resolutions.

- B. **Resolution:** In some cases, the individual may be expected to (i) terminate the business relationship or practice giving rise to the conflict, (ii) sever their employment or board appointment with the College, or (iii) take such other action as may be recommended by the College to avoid any perception of conflict. The President or their designee will have final say on whether a conflict or an unacceptable perception of conflict has been identified, and final determination of the resolution.
- C. **Transparency:** Any significant conflicts and resolutions will be documented, ensuring accountability and transparency.

### References

[Statement of Financial Interests Form](#)  
[Supplemental Employment Policy](#)

<i>Audience</i>	<i>Employees</i>
<i>Effective Date</i>	<i>7/18/2025</i>
<i>Date Revised</i>	
<i>Date Reviewed</i>	
<i>Owner</i>	<i>Vice President of Finance and Administration</i>