

Cohocton Public Library Conflict of Interest Policy

Cohocton Public Library Board of Trustees, Library Director and employees of the Cohocton Public Library shall adhere to the highest standards of honesty, good faith and fair dealing in all activities relating to the organization. Cohocton Public Library encourages all to use the four values of caring, respect, honesty and responsibility in all of their activities.

1. The following guidelines are to be followed
 - a. No trustee, employee or any member of their respective families or households shall accept gifts, gratuities, or favors of any kind from any person, firm or corporation doing business or seeking to do business with the library and which could reasonably be expected to influence, or create the appearance of influencing, their actions affecting the library.
 - b. Full and complete disclosure of any related party transaction is required. A “related party transaction” means any transaction or agreement in which a related party has a financial interest and in which the library is a party. A related party can be any trustee, officer, or committee member to whom the board has delegated powers, a key employee of the library; any person who exercises any power over the affairs of the library; a relative of any of the above people, an entity in which any of these individuals has a 35+% beneficial interest; or partnership or professional corporation in which any of these individuals owns a direct or indirect ownership interest >5%.
 - c. Without full and complete disclosure to and approval by the Board of Trustees or its Executive Committee, no trustee or employee shall have any position of influence with, or a material financial interest in, any other entity, the existence of which does or could reasonably be expected to conflict with the proper performance of their duties or responsibilities to the library, or which could reasonably be expected to affect their independent judgment and action with respect to transactions between the library and such other entity. If such a position exists, it must be disclosed to the Library Director and President of the Board.
 - d. Each trustee and administrator shall provide the Board of Trustees or the Executive Committee with a written notification of any transaction or situation that may imply any reasonable doubt concerning the possible existence of a conflict of interest by the director or administrator.
 - e. In the event that the library may wish to contract or enter into an arrangement for goods or services under circumstances that may present a conflict of interest affecting one or more of its trustees or administrators the following shall apply.
 1. The affected person(s) of the library agree(s) to provide full information to the Board of Trustees or its Executive Committee to allow the Board of Trustees or its Executive Committee to approve or disapprove by resolution, with the advantage of full disclosure, such contract or arrangement.
 2. The affected person shall recuse themselves from the vote.

- f. Annually, or upon start of duties, library trustees and the library director shall complete and return to the Library Director or their designee a Disclosure of Interests Form.
- g. The Library Director shall administer this policy. Any disputed action of the Library Director with respect to this policy shall be resolved by the Board of Trustees.

Adopted by the Cohocton Public Library Board on Trustees June 20, 2023

Cohocton Public Library Disclosure of Interest Form

Person Completing the Form: _____

Position / Title: _____

Verified by Library Director: _____ Date: _____

The conflict of interest policy, which sets forth standards of expected conduct, includes a provision which requires trustees and the library director to disclose all interests which could result in a conflict. Please complete and return the enclosed Disclosure of Interests Form. Please be assured that the disclosure requirements are intended to provide the Board with a systematic and ongoing method of disclosing and ethically resolving potential conflicts of interest. Although it is impossible to list every circumstance giving rise to a possible conflict of interest, the following will serve as a guide to the types of activities that might cause conflicts and that should be fully reported:

1. Outside Interests

- a. To hold, directly or indirectly, a position or a material financial interest in any other entity from which the individual has reason to believe the library secures goods or services (including the services of buying or selling stocks, bonds, or other securities), or that provides services competitive with the system.
- b. To compete, directly or indirectly with the library in the purchase or sale of property or property rights, interests or services.

2. Outside Activities

To render directive, managerial, or consultative services to any outside concern that does business with, or competes with the services of the library, or to render other services in competition with the library.

3. Inside Information

To disclose or use information relating to the library's business for the personal profit or advantage of the individual or their respective families or households.

4. Gifts, Gratuities, and Entertainment

To accept gifts, excessive entertainment, or other favors from any outside concern that does, or is seeking to do, business with, or is a competitor of, the library - under circumstances from which it might be inferred that such action was intended to influence or possibly would influence the individual in the performance of their duties.

This prohibition is not intended to preclude business meals or other nominal benefits in the reasonable and ordinary course of business.

Full disclosure of any situation in doubt should be made so as to permit an impartial and objective determination. It should be particularly noted that disclosure relates not only to yourself, but also to your respective families or households.

TO: Library Director and Library Board President

RE: Conflict of Interest Disclosure

A copy of the library's Conflict of Interest Policy has been furnished to me. I hereby state that I, or members of my respective families or households, have the following affiliations or interest and have taken part in the following transactions that, when considered in conjunction with the position with or relation to the library, might possibly constitute a conflict of interest. (Check "None" where applicable)

1. Outside Interests Identify any interests, other than investments, of yourself or your respective families or households, as described in the first numbered paragraph of the accompanying disclosure form.

☐ None

2. Investments

List and describe, with respect to yourself or your respective families or households, all investments that might be within the category of "financial interest", as described in the first numbered paragraph of the accompanying disclosure form.

☐ None

3. Outside Activities Identify any outside activities, of yourself or your respective families or households, as described in paragraph number 2 of the accompanying disclosure form.

☐ None

4. Other List any other activities in which you or your respective families or households are engaged that may be regarded as constituting a conflict of interest, giving particular attention to the paragraphs numbered 2 and 3 of the accompanying disclosure form.

☐ None

5. I hereby certify that neither I nor any member of my respective families or households has accepted gifts, gratuities, or entertainment that might influence my judgment or actions concerning the business of the library, except as listed below:

I hereby agree to report to the Library Director and Board President any further situation that may develop before completion of my next questionnaire.

Date

Name (Printed or typed)

Signature

Adopted by the Cohocton Public Library Board of Trustees April 17, 2023.