

CONFLICT OF INTEREST POLICY

ST. LAWRENCE COUNTY DEPARTMENT OF SOCIAL SERVICES

General Expectations

In addition to an employee's obligation under the general municipal law as well as the St. Lawrence County Ethics Local Law of 2009 as amended from time to time, all employees of the St. Lawrence County Department of Social Services should abide by this established policy specifically related to conflicts of interest that may arise within their professional environment. Employees will be alert to and avoid conflicts of interest that interfere with the exercise of professional discretion and impartial judgment. Employees will inform their immediate supervisor as soon as possible when a real or potential conflict of interest arises and take reasonable steps to resolve the issue in a manner that makes the clients' interests primary and protects clients' interests to the greatest extent possible.

Employees will not take unfair advantage of any professional relationship or exploit others to further their own interests. In some cases, protecting clients' interests may require termination of the professional relationship with proper referral of the client.

Treatment of Dual Relationships

Employees will only engage in professional relationships with clients or former clients to avoid a risk of exploitation or potential harm to the client. Employees will always take steps to protect clients and clear and appropriate boundaries in all relationships.

When employees provide service to two or more people who have a relationship with each other (for example, couples, family members), employees will clarify with all parties which individuals will be considered clients and the nature of employees' professional obligations to the various individuals who are receiving services. Employees who anticipate a conflict of interest among the individuals receiving services or who anticipate having to perform in potentially conflicting roles (for example, when an employee is asked to testify in a child custody dispute or divorce proceedings involving clients) will clarify their role with the parties involved and take appropriate action to minimize any conflict of interest.

Practical Action Steps

If a conflict of interest is identified, the employee will discuss the situation with their immediate supervisor as soon as possible before performing any additional work. The supervisor will consider the factors and have final decision regarding whether a conflict exists. If the conflict is confirmed by the supervisor, the case will be transferred from the employee. Depending on the seriousness of the conflict, this will involve one of the following actions:

Re: Conflict of Interest Policy
St. Lawrence County Department of Social Services

1. Case transfer to another employee in the Department. This is implemented when the conflict is employee-specific and is largely remediated by transfer to another employee within the Department.
2. Case transfer to a neighboring county. This is appropriate where the conflict is significant and cannot be remediated with County resources, such as cases involving a current Department employee. Please note extending this procedure to all county employees is not considered necessary or efficient.
3. Marking a case "case sensitive" in Connections when applicable in certain departmental units such as Children's Services or Child Protective Services, where case details cannot be accessed by the employee who has a conflict.

When a transfer is performed, the employee's supervisor will notify the County Commissioner within three (3) business days. The employee's supervisor will also request that the Commissioner, Deputy Commissioner, Director of Services, or a Grade A Supervisor provide guidance if they are unsure of whether a conflict of interest exists or of the best course of action. Written record of all conflict transfers will be stored electronically in On Base with limited access by IT or the Administrative Assistant.

By signing this document, I agree to conduct myself in accordance with the St. Lawrence County Department of Social Services Conflict of Interest Policy as described above.

Printed Name: _____

Signature: _____

Date: _____