

Community Action of Southeast Iowa

Ethics Policy

Each employee, Policy Council member, and Board member of Community Action of Southeast Iowa is expected to demonstrate the highest standards of personal integrity, truthfulness, confidentiality, and honesty in the performance of his or her job functions, duties and responsibilities. Employees, Policy Council members, board members, volunteers, and consultants are required to comply with all laws, rules, regulations, and contractual agreements.

- A. Confidentiality of Information: Information about children, families, other employees or the Agency will not be divulged to anyone other than the persons who are duly authorized to receive such information. This policy extends to both internal and external disclosure. Any breach of confidentiality will result in corrective action up to and including termination of employment. All communications with persons or organizations outside the Agency regarding specific information about any of our customers is strictly forbidden unless staff has previously obtained written consent from the customer to release such information. The only exceptions to the policy is when a licensing agency, funding body or auditor wishes to review files for compliance purposes (in such a case, Program Directors or the Executive Director may grant staff permission to disclose information for the purpose of review), when records are duly subpoenaed by a court of law, and in the case of suspected child abuse or neglect, which we are mandated to report.
- B. Conflict of Interest: See the Conflict of Interest Statement and Personnel Policy # 108.
- C. Drug and Alcohol-Free Workplace: See Personnel Policy #702.
- D. Application for Services: To ensure the application for service process is conducted in an ethical manner, the following conditions shall apply:
 - 1. Clients who are Relatives or Close Personal Friends of Employees: Relatives or close personal friends of Agency employees who apply for Agency services will not be afforded undue preference, and will have to follow the same criteria for application and selection as the general public. They will not receive preferential appointment times, or in any way receive any special treatment. The employee who is a relative or close personal friend will not be involved in the application, eligibility determination, or service delivery in any manner.
 - 2. Employees as Clients: Employees who wish to apply for services may apply in a manner similar to the general public. They must obtain an appointment time like any other clients, and must apply through the Director of the Program or a Program Coordinator designated by the Director.
- E. Head Start Standards of Conduct: In addition, as a Head Start grantee, Community Action of Southeast Iowa will ensure that all Head Start employees, consultants, and volunteers abide by the program's Standards of Conduct, as outlined in the Program Performance Standards which specifically include:
 - 1. Respecting and promoting the unique identity of each child and family and refraining from stereotyping on the basis of gender, race, ethnicity, culture, religion, or disability;
 - 2. Following program confidentiality policies concerning information about children, families, and other staff members;
 - 3. Ensuring no child will be left alone or unsupervised while under their care;
 - 4. Using positive methods of child guidance and not engaging in corporal punishment, emotional or physical abuse, or humiliation;

5. Refraining from using methods of discipline that involve isolation, the use of food as punishment or reward, or the denial of basic needs.

F. Improper Conduct and Whistle-Blower Protection

Community Action of Southeast Iowa believes that in order for the agency to engage in its mission, all aspects of its service contracts, as defined in Chapter 8F.2(8), the Code of Iowa, including its financial practices and management must be free from any activities that may be illegal or constitute fraud and abuse.

1. Reporting: Community Action of Southeast Iowa encourages employees who have a reasonable belief that fraud may exist or that inappropriate conduct relating to the agency's financial affairs may have occurred to contact the Executive Director. If it is perceived that the Executive Director is involved the president of the Board of Directors should be contacted. Any report should contain sufficient information to permit an appropriate internal investigation.
2. Investigation: The investigation shall be conducted in as confidential a manner as permitted under the circumstances. Based upon the results of the investigation, appropriate corrective action will be taken. The action will include appropriate discipline of the employees involved in the improper conduct. There will also be implementation of systematic controls and procedures to reduce the risk of a similar situation occurring. The reporting employee will be notified of the conclusion of the investigation; however, due to confidentiality concerns, the reporting employee will not be privy to the result of the investigation or the resulting discipline, if any, of individuals involved in the improper conduct.
3. Non-retaliation: Any employee who makes a report shall not be subject to adverse employment action by Community Action of Southeast Iowa for making the report, even if the report is investigated and found to be unfounded. Such adverse employment action shall include firing, demotion, suspension, harassment or failure to consider the employee for promotion.

G. Employee Right to Disclose Information to an Oversight Agency: It is the policy of Community Action of Southeast Iowa that all employees have the right to disclose information to an oversight agency, the Office of Citizens' Aide, the Auditor of the State, or the Office of the Attorney General. No employee shall receive any adverse employment action for disclosing any information about a service contract to the oversight agency, the Auditor of the State, or the Office of Citizens' Aide. This information is included in the Personnel Policies provided to each which affirms this right, and lists the telephone numbers of the oversight agencies, the Office of Citizens' Aide, the Auditor of the State, and the Office of the Attorney General.

H. Training: All new employees, Policy Council members and Board members shall be trained regarding the provisions of the policy, and shall receive a copy of this policy upon orientation to the Agency. Periodic training for current employees will also be provided. All employees, Policy Council members and Board members shall sign a copy of this policy which indicates they have been trained on the provisions of this policy.

I. Violation: Violation of any of these Ethics policies by employees, including the Head Start Standards of Conduct, is cause for disciplinary action up to and including termination of employment. The employee's signature indicates that the employee agrees to abide by this Ethics policy.

Conflicts of Interest

Employees and Board or Policy Council Members have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. Community Action will operate within the following framework concerning conflicts of interest:

- An actual or potential conflict of interest occurs when an employee, Board or Policy Council member is in a position to influence a decision that may result in a personal gain or gain for a relative as a result of Community Action's business dealings. For the purposes of this policy, a relative is a spouse, parent, grandparent, child, grandchild, brother, sister, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law or a significant other.
- Transactions with outside firms or individuals must be conducted within a framework established and controlled by the executive level of Community Action.
- No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if an employee, Board or Policy Council member has any influence on transactions involving purchases, contracts, or leases, or has an ownership or investment interest in any entity with which Community Action is doing business, it is imperative that he or she disclose to the Executive Director as soon as possible the existence of any actual or potential conflict of interest so that safeguards can be established to protect all parties.
- There shall be no purchases made with an anticipated total cost in excess of five hundred dollars (\$500) within any 12 month period from any employee, Board member, or Policy Council member or their relatives without the consent of the Board of Directors.
- No employee may serve as a voting member of the Board of Directors or other major policy advisory body of this agency. No person serving as a member of the Board of Directors or other major policy advisory body may apply for any position in the agency while serving as a Board or Council member. No employee or member of their immediate family may serve on the Policy Council except Head Start or Early Head Start parents who occasionally substitute for regular Head Start or Early Head Start Staff.
- If a member of the Board or Policy Council is a relative of an employee, they must make this relationship known to the Executive Director and abstain from any action concerning that employee and personnel matters.

It is the responsibility of the employee or Board or Policy Council member to be aware of actual or potential conflicts of interest.

I understand that it is my responsibility to be aware of actual or potential conflicts of interest. Should a conflict of interest arise that I can not eliminate, I understand that I should notify the Executive Director and not participate in any action relating to the issue from which the conflict arose.

Failure to comply with this policy may result in disciplinary action, up to and including dismissal.

Printed Name: _____ Position: _____

Signature: _____ Date: _____