

108 Conflict of Interest

Effective Date: 04-19-94
Revision Date: 02-20-07

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 cannot 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: _____