

Adopted: June 26, 2023

Revised:

AGAMIM CLASSICAL ACADEMY POLICY

Personnel No. 403

CONFLICT OF INTEREST/ETHICS FOR EMPLOYEES

Note: Agamim Academy has established this guidance in accordance with the Uniform Governance Guidance 2 CFR 200, Subpart 8, Section §200.112-113.

I. PURPOSE

The purpose of this policy is to observe state statutes regarding conflict of interest and to avoid any conflict of interest or the appearance of impropriety.

II. PROCEDURES

A. Prohibitions and Requirements

Agamim Classical Academy Employees will not engage in any activity that conflicts, or that raises a reasonable question of conflict, with their responsibilities in the school. More specifically, employees will not:

1. Use institutional privileges for private gain.
2. Solicit or receive compensation other than that allowed by law for performance of their duties. This precludes, among other things, acceptance of any gratuities, gifts, or favors that might impair or appear to impair professional judgment; and any personal dealings with any individual or entity, with whom they, on behalf of the Board, have any direct or indirect contact for purposes of obtaining from such individual or entity noncompetitive contracts, services, or materials.
3. Knowingly authorize or employ the authority or influence of their office or position to secure authorization of any public contract in which they, members of their family, or any of their business associates have an interest.
4. Offer any favor, service, or thing of value to obtain special advantage.
5. Permit commercial exploitation of their professional position.
6. Engage in selling any of the following merchandise or services for personal profit to students or parents: instructional supplies, equipment, reference books, instructional data, intellectual property, and educational tours.
7. Furnish lists of students or parents to anyone selling such materials or services.

Employees will use time granted for leave, planning, and workshops for the purpose for which it is intended.

B. Conflict of Interest

A mandatory code of conduct will be followed by all members of the staff and vendor/contractors in the business of providing goods and/or services to the school system. The requirements will include, but are not limited to, the following situations:

1. Awarding of any and all building and construction contracts regardless of amount;
2. Awarding of any and all contracts for the providing of goods, *e.g.*, football equipment, basketball equipment, track shoes, films, books, food services, and items of like nature;
3. Awarding of any and all contracts for the providing of services, *e.g.*, window washing, accounting, architectural, cartage, snow removal, security, preemployment physicals, and other services of like nature;
4. Selection of financial institutions for the deposit of funds; and
5. Such other relationships as the Board determines.

C. Standards Determining Conflicts of Interest

For the purpose of this policy, a conflict of interest is deemed to exist when any of the following situations occur:

1. A member of the staff has an interest, by way of ownership or employment, in any firm or company doing business with the school;
2. A member of the staff has a relationship by way of consanguinity or marriage to an owner, officer, employee, and/or consultant of a corporation or firm doing business with the school; and
3. A member of the staff uses the position to foster interests that differ or are in conflict with those of the school.

When a member of the staff has filed such a disclosure on the Agamim Conflict Reporting Form, they must obtain written approval from the Executive Director in order to function as staff on any and all projects involving that business relationship. Should any staff member fail to file such a disclosure, they subject themselves to any sanction imposed by the Executive Director and approved by the Board, including termination of employment.