

STAFF CONFLICTS OF INTEREST

A conflict of interest occurs when a Western Wayne Schools (“Corporation”) employee or Board member knowingly or intentionally benefits financially from a contract with the Corporation or a purchase made by the Corporation. Many conflicts of interest arise from “innocent” dealings made with good intentions, but the employee did not understand the potential for a conflict. Corporation employees who engage in an impermissible conflict of interest are subject to felony criminal charges and may be subject to discipline, up to and including termination.

Employees shall not engage in, or have a financial interest (directly or indirectly), any activity that conflicts or raises a reasonable question of conflict with his or her responsibilities to the Corporation.

Any employee who has reason to believe that he or she **may** have a conflict of interest is required to disclose the potential conflict to his or her principal or immediate supervisor. The principal or immediate supervisor may counsel the employee on the appropriate next steps, which may include disclosing the conflict of interest to the School Board.

Activities which are Potentially Acceptable through Disclosure

Some potential conflicts of interest may be permissible if the employee provides the appropriate disclosure to the Board. The disclosure must be written and signed under penalties of perjury, then submitted to and accepted by the Board in a public meeting before the Board approves the contract or purchase in question. If the Board accepts the disclosure, the employee must then submit the disclosure form to the Indiana State Board of Accounts and to the County Clerk. The disclosure form may be found [here](#).

Employees shall appropriately disclose any situation which the employee has reason to believe may fall into one of the categories below:

1. Employees shall appropriately disclose a contract or purchase, current or future, which involves the Corporation employing or paying fees to the employee’s spouse, child, or any other dependent.
2. Employees shall appropriately disclose a contract or purchase which involves the Corporation and may directly or indirectly benefit the employee, but the employee a) does not have the power to make contract or purchases on behalf of the Corporation, *and* b) the contract or purchase is unrelated to the employee’s regular job duties.

If the contract or purchase is ongoing, the employee must re-submit the disclosure form to the Board, State Board of Accounts, and County Clerk every twelve (12) months.

Activities Prohibited at all Times

Some conflicts of interest are prohibited in totality and no disclosure to the Board is able to alleviate the impermissible conflict. The following list is for illustrative purposes and does not limit impermissible conflicts of interest:

- Employees shall not use Corporation materials, equipment, or facilities in private practice.
- Employees shall not accept gifts, favors, services, entertainment, food, or drink that exceed an aggregate value of \$250 in any calendar year from a person or entity desiring to do business or at the time engaged in business with the Corporation.
- Employees may only engage in business, private practice of their profession, rendering of services, or sale of goods or information where doing so would not take advantage of, or compromise, any professional relationship they may have with any student, client, contracted service provider, volunteer, or parents of such students or clients in the course of their employment with the Corporation.
- Employees shall not refer any student or parents of such student for lessons or services to any private business or professional practitioner if there is any expectation of reciprocal referrals, sharing of fees, or other remuneration for such referrals.
- Employees shall not require any student or parents of such student to purchase any goods or services provided by an employee, or any specific business or professional practitioner with whom the employee has a financial or familial relationship, as a condition of receiving a grade, credit, promotion, approval, or recommendation. This does not include nominal gifts given by a student or parent to an employee as a gesture of good will.
- Employees shall not solicit or accept any honorarium or payments for speeches, presentations, or articles as a representative of the Corporation.

These guidelines shall not prohibit political contributions which are reported in accordance with applicable law. These guidelines shall not prohibit contributions to the Corporation, the Western Wayne Education Association, or any other nonprofit associated with the Corporation. These guidelines shall not be interpreted as intending to discourage acts of generosity in usual situations.

Adopted: [9-14-2021]

Revised: [date]