

EMPLOYEE CONFLICT OF INTEREST

PURPOSE: To establish what constitutes a conflict of interest for District employees.

No employee should have any outside business interests that might, in fact or appearance, interfere with the employee's loyalty to the District. No employee should have any interest or association that interferes with, or appears to impair, the independent exercise of the employee's judgment in the best interests of the District. This policy applies to all employees of the District. Failure of any employee to abide by this policy could result in discipline, including suspension and/or employment termination. In addition, any potential conflict of interest pertaining to federal funding must be disclosed in writing to the Oklahoma State Department of Education or the United States Department of Education, as appropriate.

The integrity of the District's purchasing/contracting procedure must be above reproach. The acceptance or solicitation of gifts or favors by employees will not be tolerated.

The Superintendent or designee shall monitor all employment and assignment activities to assure compliance with this policy. Exceptions may be granted when in the best interest of the District and to avoid unfairness to an employee, but only with written permission of the Superintendent or designee.

Conflicting Business Situations

Employees shall not be concurrently employed by or otherwise seek or accept concurrent employment or compensation with a business organization that does business, or is seeking to do business, with the District unless the engagement is for the District employee's duty free time (i.e., nights, vacations, holidays, weekends); the District employee's compensation does not vary directly or indirectly depending on the amount of business the organization does with the District; the District employee, as a practical matter, does not have the ability to influence or recommend purchases by the District from the organization; and the District employee does not own or control in excess of three percent of the ownership of the business organization.

The District will not do business with any business organization or entity in which a District employee, or member of the District employee's immediate family or household, has an equity ownership except for a minority interest of three percent or less in a publicly-owned corporation.

Types of organizations that are examples of those that should be considered business organizations doing business with the District are: an office or equipment supplier; vendors of computer hardware, software or automation services; fund-raising organizations; insurance or annuity brokers; building contractors; management services, etc.

Inappropriate Transactions

No employee shall seek or offer any gift, payment, fee, service, rebate, valuable privilege, hospitality, meal, entertainment, admission tickets, flowers, discount, travel, sporting event (including golf and other social athletic events), vacation, use of vacation property, loan (other than a conventional loan from a lending institution), or other favor from any person or business organization that does, or seeks to do business, with the District. No employee shall accept, offer, or convert anything of value in exchange for referral of third parties to any such person or business organization.

No employee shall accept or offer gifts or favors (including those described above) from any person or business organization where these might tend, or appear to tend, in any way to impair independent judgment concerning District business operations. Employees may offer common courtesies, gifts, or meals with an individual value not greater than \$50 that are usually associated with accepted business practices. Employees may accept common courtesies, gifts or meals with an individual value not greater than \$125 that are usually associated with accepted business practices. Additionally, promotional and advertising novelties and tickets specifically used for advertising purposes are allowable. If an unsolicited gift of more than nominal value is offered or received, it must be declined or returned.

Any offer of a gift or favor of more than nominal value shall be reported promptly in writing to the employee's supervisor, or in the case of the Superintendent, by the Superintendent to the Board president.

Under no circumstances is it permissible to accept or offer a gift of cash or cash equivalents (for example, gift certificates, stocks or other forms of marketable securities).

Travel

Employees will not accept or participate in travel that is paid or provided by a vendor or prospective vendor, even if the travel is deemed to benefit the District. Vendors or prospective vendors who extend travel opportunities to District employees are to be advised of this policy. Employees who have developed a specialized or particular expertise in their field may attend industry-sponsored conferences or conferences sponsored by a vendor or prospective vendor, with travel and other expenses paid by the sponsor if: (1) the employee is attending as a representative of the District; (2) similar employees from other entities are invited to attend; and (3) the employee notifies the Superintendent, in writing, and receives written permission from the Superintendent in advance of the travel.

Unlawful or Unethical Payments

It is in the best interests of the District to avoid even the appearance of impropriety. The District's concern is not only whether activity is technically legal or customary, but also whether or not the public might reasonably view such an act as improper or unethical if all the circumstances were fairly disclosed. The District intends to follow a uniform practice in all areas of its operations consistent with its basic policy.

Employee Annual Statement

Annually the following employees will complete, sign and submit an appropriate statement attesting to compliance with this policy: the Superintendent, members of the Superintendent's cabinet, executive directors, directors, principals, and coordinators. The annual statements will be circulated and reviewed by the Human Resources Department. All employees who are new to their respective positions will be notified of this requirement in connection with training/orientation sessions.

Negotiations and Competition

Representation of the District in a transaction in which the employee, officer, agent, or any close relative has a substantial interest is prohibited. Competition with the District, directly or indirectly, in the purchase or sale of property or interests in property is prohibited.

Outside Employment and Directorships

Employees are expected to devote their full working time to the duties of their positions for the sole benefit of the District. Exceptions must be approved in advance by the responsible Cabinet member. Outside directorships in business corporations must be approved in advance by counsel.

District Property

Materials developed by employees of the District during the course of their employment such as software, hardware devices, products, patents, advertising materials, manuals, etc., are the exclusive property of the District. Such materials may not be used for any purpose other than District business.

The removal of any food, supplies, equipment or other District property, including official records, is prohibited. Individual sales by any school employee of District property, except for District property which has been declared surplus according to District policy, to an outside business interest or other school employee is prohibited.

Sales By/Purchases from Employees

Employees and immediate family members may not solicit the District or other employees concerning sales for personal benefit, political or charitable causes. It is generally deemed inappropriate for an employee, during the course of employment, to solicit students, parents, or patrons for personal benefit, political or charitable causes.

Additionally, purchases by the District from employees should be severely restricted to special circumstances where the product or service is not available from other sources.

Any employee who believes a violation of this policy has occurred should immediately report the observation to the Superintendent or designee. The Superintendent or designee will investigate the allegations and take appropriate action.