

**PURCHASING AND CONTRACTING:**  
**PROCUREMENT STAFF CODE OF CONDUCT**

1.0 Conflict of Interest

1.1 All employees of the Scarborough School Department will perform their duties in a manner free from conflict of interest to assure the proper performance of school business as well as to earn and keep public confidence. No employee of the Scarborough School Department with a real or an apparent conflict of interest in a proposed transaction will participate in the selection, award, or administration of a contract pursuant to the transaction. Further no employee shall make purchases from or enter into a contract with any vendor or provider with whom there is a real or apparent conflict of interest.

1.2 Conflict of interest is defined as when an interested party has a financial interest in the firm selected for the award. Interested party is defined as: 1) the employee; 2) a member of the employee's immediate family; 3) his/her partner; or 4) an organization that employs, or is about to employ a person described above.

2.0 Conflict of Interest Disclosure

2.1 All employees with real or apparent conflicts of interest as defined above must disclose the conflict of interest to the Superintendent who will investigate the circumstances of the transaction. The Superintendent will exercise due diligence in investigating the circumstances of the transaction and, if necessary, will make reasonable efforts to find alternatives to the proposed transaction or arrangement that would not give rise to a conflict of interest. If the Superintendent determines that the proposed transaction is in the best interest of the Scarborough School Department and is fair and reasonable, it may proceed with the transaction. In the event that the Superintendent may have a conflict of interest, an ad hoc committee of the School Board will investigate and make a determination regarding the transaction.

3.0 Violations

3.1 Employees of the Scarborough School Department who violate this code of conduct may be subject to discipline, up to and including termination of employment, and, if appropriate, referral to law enforcement.

Legal Reference: EDGAR Part 74 Title 34 - Administration of Grants and Agreements  
EDGAR Part 80 Subpart C, Section 80.20, 80.36  
DOE Administrative Letter 6 – 9/18/2006 – NCLB Fiscal Compliance

Cross Reference: BCB - Board Member Conflict of Interest  
KCD - Public Gifts to the Schools

Adopted: April 3, 2008