LENAPE TECHNICAL SCHOOL

SECTION: FINANCES

TITLE: CODE OF CONDUCT

ADOPTED: December 20, 2007

REVISED: February 18, 2016

625. CODE OF CONDUCT

1. Purpose

A Code of Conduct for business and financial operations helps develop trust by describing what the public can expect from the School, and what employees can expect from each other. It plays a central role in our School's commitment to help school personnel achieve the highest ethical standards in their professional activities and relationships. The goal is to create a culture that fosters trust, commitment to excellence and responsibility, personal and institutional integrity, and avoids conflicts of interest and appearances of impropriety.

2. Authority
SC 510,440.1, 621,622, 623

Application and Enforceability

The Code of Conduct applies to all school personnel. Violations of this Code of Conduct may result in administrative or disciplinary action as appropriate.

Employees must at all times, comply with all applicable laws and regulations. The School will not condone the activities of employees who achieve results through violations of the law or unethical business dealings. This includes, but is not limited to, any payment for illegal acts, indirect contributions, rebates and bribery. The School does not permit any activity that fails to stand the closest public scrutiny.

All business conduct should be well above the minimum standards required by law. Accordingly, employees must ensure that their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing School operations.

Employees uncertain about the application or interpretation of any legal requirement should refer the matter to their supervisor, who, if necessary should seek the advice of the Administrative Director.

Conflicts of Interest

All employees will perform their duties conscientiously, honestly, and in accordance with the best interests of the School. Employees must not use their position or their knowledge gained as a result of their position for private or personal advantage. Regardless of the circumstances, if employees sense that a course of action they

	have pursued, are presently pursuing, or are contemplating pursuing may involve them in a conflict of interest with the School, they should immediately communicate all the facts to the Administrative Director. **Clients and Suppliers** Employees should avoid investing in or acquiring a financial interest for their own accounts in any business organization that has a contractual relationship with the School, or that provides goods or services, or both to the School, if such investment could influence or create the impression of influencing their decisions in the performance of their duties on behalf of the School.
3. Delegation of Responsibility	**Gifts, Favors, Entertainment** Excepting things of deminimus economic value or impact, employees must not accept entertainment, gifts, personal favors or preferential treatment that could, in any way, influence or appear to influence business decisions in favor of any person or organization with which the School has, or is likely to have, business dealings. **Kickbacks and Secret Commissions** Regarding the School's business activities, employees may not receive payment or compensation of any kind, except as authorized under the Joint Operating Committee's policies and procedures. The Joint Operating Committee strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others. Any breach of this rule will result in immediate termination and prosecution to the fullest extent of the law.
4. Guidelines	**Organization Funds and Other Assets** Employees who have access to School funds in any form must follow the prescribed procedures and policies for recording, handling, and protecting money. The Joint Operating Committee imposes strict standards to prevent fraud and dishonesty. If employees become aware of any evidence of fraud or dishonesty, they should immediately advise the Administrative Director so that the School can promptly investigate. When an employee's position requires spending funds or incurring any reimbursable personal expenses, that individual must use good judgment on the School's behalf to insure that good value is received for each expenditure. Funds and all other assets of the School are for the School's purposes and not for personal benefit. This includes personal use of the School's assets, such as computers.

Organization Records and Communications

Accurate and reliable records of many kinds are necessary to meet the School's legal and financial obligations, as well as to manage the affairs of the district. The School's books and records must reflect in an accurate and timely manner all business transactions. The employees responsible for accounting and record keeping must filly disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements.

Employees must not knowingly make or engage in any false record keeping or communications of any kind, whether internal, including but not limited to:

1. False expense, attendance, financial or similar reports and statements.

2. False advertising and other misleading representations.

Prompt Communications

In all financial matters, employees must make every effort to achieve complete, accurate, and timely communications-responding promptly and courteously to all proper requests as per School Policies and Procedures.

Employee Conduct

Employees will:

1. Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships.

2. Provide information that is accurate, complete, objective, relevant, timely, and understandable.

3. Comply with rules and regulations of federal, state, and local governments, and other appropriate private and public regulatory agencies.

4. Act in good faith, responsibly, and with due care, competence and diligence, without misrepresenting material facts or allowing one's independent judgment to be subordinated.

5. Respect the confidentiality of information acquired in the course of one's work except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of one's work will not be used for personal advantage.

6. Proactively promote ethical behavior in the work environment.

7. Achieve responsible use of and control over all assets and resources entrusted to the employee.

8. Report improper conduct to the Administrative Director immediately.

The School will not threaten, harass, punish or retaliate against employees who make good faith complaints.

Public Official and Employee Ethics Act

This Policy is not meant to supersede or replace the Public Official and Employee Ethics Act, 65 Pa.C.S. §1101 et seq. This Policy is meant to compliment the Ethics Act. This Policy intentionally expands upon activities which are prohibited or restricted by the Ethics Act. It is hereby recognized that this policy is in many instances more strict then the Ethics Act.