

Policies

Westerly Public Schools Procurement Code of Conduct

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Purpose

This Code of Conduct establishes standards of behavior for all employees, officers, and agents engaged in the selection, award, and administration of contracts supported by Federal funds, including but not limited to the Child Nutrition Programs administered under the U.S. Department of Agriculture (USDA).

1. Standards of Conduct

No employee, officer, or agent of Westerly Public Schools shall participate in the selection, award, or administration of a contract supported by a Federal award if a real or apparent conflict of interest would be involved.

A conflict of interest arises when:

- The employee, officer, agent, any member of their immediate family, their partner, or an organization employing or about to employ any of these parties has a financial or other interest in a firm considered for a contract; or
- The employee, officer, or agent receives or benefits from anything of monetary value from a contractor or potential contractor.

Examples of Prohibited Conduct:

- An employee, officer, or agent of Westerly Public Schools cannot disclose or use confidential information obtained through their official duties to further their personal financial gain.
- An employee, officer, or agent of Westerly Public Schools cannot engage in a substantial financial transaction for the private party's business purposes with a person under their supervision.
- An employee, officer, or agent of Westerly Public Schools cannot perform an official act that directly benefits a business that the district is financially interested in, or a business for which the district is a counsel, consultant, representative, or agent.

2. Gifts, Gratuities, and Favors

Officers, employees, and agents of Westerly Public Schools are strictly prohibited from soliciting or accepting gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to subcontracts.

Exceptions: The only permissible exceptions are:

- Unsolicited items of nominal value (e.g., coffee mugs, pens, small tokens).
- Participation in widely attended events of minimal cost when approved in advance by a supervisor.

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3. Organizational Conflicts of Interest

The District will avoid any organizational conflict of interest where a contractor's relationship, financial interest, or activity impairs its objectivity or gives it an unfair competitive advantage.

4. Disciplinary Actions

Violations of this Code of Conduct will result in appropriate disciplinary actions, up to and including termination of employment and/or referral for civil or criminal prosecution, as permitted by law and District policy.

5. Transparency and Accountability

All procurement records and documentation will be maintained to detail the significant history of each procurement action, including the rationale for the selection of methods, contract type, vendor selection or rejection, and basis for contract price.

6. Federal References

This Code of Conduct complies with the following Federal requirements:

- 2 CFR § 200.31 S(c)(1)-(2) (General procurement standards)
- 7 CFR 210.21(c) (Procurement requirements for the National School Lunch Program)
- Appendix II to 2 CFR Part 200 (Required contract provisions)

Adopted: January 21, 2026