SPRING-FORD AREA SCHOOL DISTRICT

SECTION: ADMINISTRATIVE EMPLOYEES

TITLE: CONFLICT OF INTEREST

ADOPTED: June 19, 2006

REVISED:

319.1. CONFLICT OF INTEREST

1. Purpose 65 Pa. C.S.A. Sec. 1101 et seq	The Board recognizes that in order to maintain the public trust, it must ensure that employees of the Spring-Ford Area School District avoid conflicts of interest and the appearance of conflicts of interest, and that employees who are public employees comply with the Ethics Standards and Financial Disclosure Act, 65 Pa. C.S.A. section 1101 et seq.
2. Authority	The Board is responsible for established policies which enable it to maintain the public trust and engage in sound business practices. <u>Scope</u> Compliance with Board policy and the Ethics Standards and Financial Disclosure Act shall be conditions of continued employment by and contractual relations with the district. This policy applies to (1) vendors of the Spring-Ford Area School District and (2) Spring-Ford Area School District employees who (a) have the ability to engage in a conflict of interest and/or (b) are public employees within the meaning of the Ethics Standards and Financial Disclosure Act.
3. Definitions	The definitions of the Ethics, Standards and Financial Disclosure Act, 65 Pa. C.S.A. section 1102 are hereby adopted as if set forth at length. This shall be the definitions that shall apply to this policy.
4. Guidelines	<u>Prohibited Activities</u> Employees shall not engage in conduct that constitutes a conflict of interest which shall be the use by a public official or public employee of the authority of his/her office or employment or any confidential information received through his/her holding public office or employment for the private pecuniary benefit of him/ herself, a member of his/her immediate family or a business with which s/he or a

	member of his/her immediate family is associated. The term does not include an action having de minimis economic impact which affects to the same degree a class consisting of the general public or subclass consisting of an industry, common occupation or other group which includes the public official or public employee, a member of his/her immediate family or business with which s/he or a member of his/her immediate family is associated.
5. Delegation of Responsibility Pol. 317	The Superintendent of Schools shall be responsible for implementation of this policy and shall make decisional purpose of this policy and for the school district policy as to who shall be required to file a Statement of Financial Interest. The criteria should be those as set forth as defining a public employee which in part is a person employed by the district who is responsible for taking or recommending official action of a non-ministerial nature with regard to (1) contracting or procurement, (2) administering or monitoring grants or subsidies, (3) planning or zoning, (4) inspecting, licensing, regulating or auditing any person or (5) any other activity where the official has an economic impact of greater than a de minimis nature on the interest of any persons. If a determination is made by the district Superintendent that such a form must be filed, notwithstanding that the Superintendent's standard may be higher than otherwise required by law, failure to do so may result in disciplinary action including the termination of employment regardless of whether the employee engaged in the activity through ignorance, negligence or deliberate disregard. Also as a matter of policy, the district in future hirings or transfers will avoid immediate family members working in same department wherein one (1) of the two (2) individuals are acting in a position of trust.