

SEDGWICK SCHOOL COMMITTEE

POLICY NUMBER: 4.05

(NEPN/NSBA Code: DJH)

Adopted: July 15, 2014

Revised: 10/19/21

Reviewed: 11/13/24

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

Conflict of Interest

All employees of the School Department shall perform their duties in a manner free from conflict of interest to ensure that the school unit's business transactions are made in compliance with applicable laws and regulations and in a manner that maintains public confidence in the schools.

No employee of the School Department shall participate in the selection, award or administration of a contract supported by federal funds or in any other transaction in which the school unit is a party if he/she has a real or apparent conflict of interest in the transaction.

A conflict of interest would arise when the employee or any member of his/her immediate family, his/her (business) partner, or an organization that employs or is about to employ any of these parties has a financial or other interest in the firm selected for the award.

For the purpose of this policy, "immediate family" is defined as spouse, brother, sister, parent, son or daughter.

Conflict of Interest Disclosure

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 proposed 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 School Department and is fair and reasonable, he/she may proceed with the transaction. In the event that the Superintendent may have a conflict of interest, an ad hoc subcommittee of the School Committee will investigate and make a determination regarding the transaction.

Staff Gifts and Solicitations

Employees, officers and agents of the School Department may neither solicit nor accept gratuities, favors or anything of monetary value from contractors or parties to subcontracts.

Employees may accept unsolicited items of nominal value such as those that are generally distributed by a company or organization through its public relations program.

Violations

Employees of the 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.

Conflict Resolution/Protest and Claims

The District will follow the processes outlined in the Federal Procurement manual to resolve any protests and claims.

Legal Reference: 34 CFR 74.40-74.48; 80.36 (Education Department General
Administrative Regulations (EDGAR)
Commissioner's Administrative Letter No. 6, June 18, 2006
(Fiscal Compliance)