

# KEYSTONE ACADEMY CHARTER SCHOOL

## CONFLICTS OF INTEREST POLICY

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Charter School Board Members and employees shall employ independent objective judgment in performing their duties, deciding all matters on their merits alone free of partiality or prejudice and unimpeded by conflicts of interest or other improper influences. No Charter School Board Member/employee shall engage in conduct that constitutes a conflict of interest, which shall be defined as use by a Board Member or employee of the authority of his/her office or the use of any confidential information received through his/her employment for the private pecuniary benefit of the Board Member/employee, a member of the Board Member/employee's immediate family (which includes for the purposes of this Code of Ethics the Board Member/employee's spouse, domestic partner, parent, sibling, and child), or a business with which the Board Member/employee or a member of the Board Member/employee's immediate family is associated.

**Financial Interest.** A Charter School Board Member/employee shall neither engage nor have any interest, financial or otherwise, direct or indirect, in any business transaction or professional entity, either as a director, officer, partner, trustee, employee, or manager in that entity which conflicts with or impairs the proper discharge of official duties or which could bring disfavor or disrespect upon the Charter School.

**Contracting Decisions.** A Charter School Board Member/employee shall not recommend, vote, or otherwise participate in the decision to make any contract valued at \$1,000 or more between the Charter School, including Student Activity Funds, and any business or entity in which the employee has a personal or financial conflict of interest.

Charter School Board Members and employees shall be deemed to have a financial conflict of interest in a decision if it is reasonably foreseeable that the decision will have a material financial effect on:

- I. The Board Member or employee's immediate family distinguishable from its effect on the public generally;
  2. Any business entity in which the Board Member/employee or a member of the Board Member/employee's immediate family has a direct or indirect investment worth \$1,000 or more or in which the Board Member/employee or a member of the Board Member/employee's family holds any position of management or is a director, officer, partner, trustee, or employee
  3. Any real property in which the Board Member/employee or a member of the Board Member/employee's immediate family has a direct or indirect interest worth \$1,000 or more; or
  4. Any source of income for the Board Member/employee or the employee's immediate family of \$1,000 or more.
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A Board Member/employee who has a financial conflict of interest because of his/her relationship with a business must remove him/herself from any decision concerning that entity including any decision to contract or not to contract with the entity and the administration of the contract.

**Honoraria.** A Board Member/employee shall not accept an honorarium that represents a payment in recognition of published works, appearances, speeches, and presentations and that is not intended as consideration of the value of such services which are non-public, occupational, or professional in nature.

**Personal Advertisements.** A Board member/employee shall not advertise business or professional activities on Charter School property or use Charter School work hours, property, or services to perform or promote personal or commercial enterprises or to campaign or raise money for any candidates for political office.

**Employee Publications.** A Board Member/employee shall not participate in the review and approval of publications or materials for Charter School purchase if the officer or employee is the author/editor of or has any financial interest in the sale of such publications or materials.

**Referrals.** A Board Member/employee shall not refer a parent or student to a service, service provider or product in return for anything of value. Officers or employees making referrals as part of their official duties shall make referrals to more than one provider of the service or product. For example, school counselors shall refer parents or students to more than one counselor or provider of medical services.

**Tutoring.** A Board Member/employee shall not tutor or counsel as a private enterprise, for compensation, pupils enrolled at the Charter School. Board Members or employees may tutor or counsel pupils enrolled in other schools unless such private enterprise conflicts with or impairs the proper discharge of official duties.

**Statement of Financial Interest.** In accordance with Pennsylvania law, the Charter School requires each member of the Board and employee at the level of Director and above to file a Statement of financial Interest with the Office of Human Resources by May 1 of each year for the immediate prior year. The Director of Human Resources may require any employee whose duties require the exercise of discretion or judgment to file a Statement of Financial Interest.

**Conflict of Interest Resolution.** In the event that a question of Conflict of Interest or the appearance of Conflict of Interest arises, the matter shall be referred to and investigated by the Director of Human Resources who will report the results of the investigation to the Chief Executive Officer. Where appropriate, the Chief Executive Officer shall call all instances involving Conflict or Interest to the attention of the Board of Directors or Board of Education with a recommendation as to how the conflict situation might best be resolved.

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