

# ROCKWELL CHARTER SCHOOL

## Conflict of Interest Policy

### **Purpose and Philosophy**

The Board of Directors of Rockwell Charter School has established this policy to prevent the personal interest of board members, staff members, and volunteers from interfering with the performance of their duties to the school; and to prevent personal, financial, professional, or political gain on the part of such persons at the expense of the school's students, parents, employees, supporters, and other stakeholders.

### **Definitions**

Board means the Board of Directors.

Conflict of Interest (also "Conflict") means something at variance or incompatible with, or the appearance of such, between the private interests and official responsibilities of a person in a position of trust.

Officer means an officer of the Board of Directors.

Persons in a Position of Trust include staff members, administrators, and board members of the school.

Staff Member means a person who receives all or part of their income from the payroll of the school.

Supporter means corporations, foundations, individuals, 501(c)(3) nonprofits, and other nonprofit organizations who contribute to the school.

Volunteer means a person, other than a board member, who does not receive compensation for services and expertise provided to the school and retains some independent decision-making authority to commit resources of the organization.

### **Policy**

- I. Full disclosure, by notice in writing, shall be made by the interested parties to the full Board of Directors in all circumstances where a conflict of interest exists, including, but not limited to, the following:
  - A board member is related to another board member or staff member by blood, marriage, or domestic partnership.
  - A staff member in a supervisory capacity is related to another staff member whom the staff member supervises.
  - A board member or the board member's organization stands to benefit from a school transaction; or a staff member of the organization receives

payment from the school for any subcontract, goods, or services other than as part of the staff member's regular job responsibilities or as reimbursement for reasonable expenses incurred as provided in the bylaws and board policy.

- A board member's organization receives grant funding from the school.
  - A board member or staff member is a member of the governing body of a contributor to the school.
  - A volunteer working on behalf of the school who meets any of the criteria listed above.
- II. Following full disclosure of a possible conflict of interest or any condition listed above, the Board of Directors shall determine whether a conflict of interest exists; and, if so, the Board shall vote to authorize or reject the transaction or take any other action deemed necessary to address the conflict and protect the school's interests. Both votes shall be by a majority vote without counting the vote of any interested director, even if the disinterested directors are less than a quorum provided that at least one consenting director is disinterested.
- III. A Board member or Committee member who is formally considering employment with the school must take a temporary leave of absence until the position is filled. Such a leave will be taken within the Board member's elected term which will not be extended because of the leave. A Board member or Committee member who is formally considering employment with the school must submit a written request for a temporary leave of absence to the Chair of the Board of Directors indicating the time period of the leave. The Chair will bring the request to the Board for action. The request and any action taken shall be reflected in the official minutes of a public board meeting.
- IV. An interested Board member, officer, or staff member shall not participate in any discussion or debate of the Board of Directors, or of any committee or subcommittee thereof in which the subject of discussion is a contract, transaction, or situation in which there may be a perceived or actual conflict of interest. However, that member may be present to provide clarifying information in such a discussion or debate unless objected to by any present board or committee member.
- V. Anyone in a position to make decisions about spending the school's resources (i.e., transactions such as purchases contracts) – who also stands to benefit from that decision – has a duty to disclose that conflict as soon as it arises (or becomes apparent); the conflicted individual should not participate in any final decisions.
- VI. A copy of this policy shall be given to all Board members, staff members, volunteers and other key stakeholders upon commencement of such person's relationship with the school or at the official adoption of this policy. Each board member, officer, staff member, and volunteer shall sign and date the policy at the

beginning of the individual's term of service or employment and each year thereafter. Failure to sign does not nullify the policy.

- VII. This policy and disclosure form must be completed and filed annually by all specified parties.

**ROCKWELL CHARTER SCHOOL**  
**Conflict of Interest Disclosure Form**

Fiscal Year \_\_\_\_\_

This form must be completed annually by all parties as identified in Rockwell Charter School's Conflict of Interest Policy.

\_\_\_\_\_ I have no conflict of interest to report

\_\_\_\_\_ I have the following conflicts of interest to report (please specify):

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The undersigned, by the affixed signature, acknowledges understanding of the implications of this policy.

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Signature

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Printed Name

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Date