

Employee Fiscal Conflict of Interest

All purchasing will be carried out in compliance with state and federal laws. No employee, officer, or agent of the Franklin Central Supervisory Union may participate in the selection, award, or administration of a purchase or contract if that person has a real, perceived, or apparent conflict of interest.

1. A conflict of interest arises if an employee, officer, agent, immediate family member, partner, or an organization that employs or is about to employ any of the parties indicated herein, has a direct or indirect financial or other interest in, or a tangible personal benefit from a vendor considered for a purchase or contract.
2. An employee will not solicit or accept any favor, gratuity, or anything of monetary value from any individual or vendor that exceeds \$25.00 in value. FCSU personnel must decline personal gifts or gratuities associated with the procurement process.
3. In the event a conflict of interest is discovered, the employee, officer, or agent, following an investigation, may be subject to disciplinary action including but not limited to a fine, a written reprimand, suspension or termination.
4. Employees of the FCSU shall exercise the utmost good faith in all transactions touching upon their duties to the FCSU and its property. In their dealings with and on behalf of the FCSU, they shall be held to a strict rule of honest and fair dealings between themselves and the FCSU. They shall not use their positions, or knowledge gained therefrom, in such a way that a conflict of interest might arise between the interest of the FCSU and that of the individual.
5. Employees shall disclose to their respective budget executive in the school or administrative unit in which they are employed any potential conflict of interest of which they are aware related to the purchase of equipment, materials, goods and services prior to the execution of the purchase request. Written disclosure must accompany the requisition to Purchasing Services. Employees may not initiate or have any influence over their school or administrative unit's purchases of goods and services from a business in which the employee, or a member of the employee's immediate family (spouse or minor child), has an ownership interest of 10% or more in that business.
6. Except in very unusual circumstances, the FCSU will not purchase equipment, materials, goods and services from an employee, a member of an employee's immediate family, or from a business in which an employee or a member of the employee's immediate family has an ownership interest of 10% or more. If an exception is necessary, the unit must provide a written disclosure of the transaction to its budget executive and the written disclosure must accompany the requisition to Purchasing Services.

7. The FCSU may not enter into any contract or transaction of \$10,000 or more with any organization in which a current or emeritus member of the FCSU Board of Directors (or any member's spouse or minor child) holds a beneficial ownership (10% or greater) unless the contract has been awarded through an open and public bidding process in accordance with FCSU purchasing policy, or has been fully disclosed to the Board of Directors and approved by the affirmative votes of a majority of the disinterested members of the Board of Directors before the Purchase Order is initiated. ("Fully disclosed" shall mean disclosure of the material facts as to the relationship or interest of the member or members of the Board of Directors, or spouse or minor child of such member or members, and disclosure of the material facts as to the contract or transaction, including a Sole Source Justification.)
8. Members of the Board of Directors shall also avoid person-to-person discussion or negotiation with the officers and employees of the FCSU for the purpose of procuring business with the FCSU.

NOTE: In order for the Directors to authorize FCSU transactions of \$10,000 or more, the Director whose business is impacted must present to the Board the situation and conditions surrounding the transaction that may result in a possible conflict of interest.