

## Conflict of Interest

The agency requires the highest possible level of conduct from all staff members and protects the integrity of the agency and its programs and facilities by recruiting and retaining the highest-quality staff. Staff members are prohibited from using their position to secure privileges for themselves or others and from engaging in activities that constitute a conflict of interest.

No agency staff member may engage in any activity that, directly or indirectly, constitutes a conflict of interest, such as:

- having a financial interest in an enterprise doing business with the agency
- acting as attorney, agent, broker, representative, or employee for or receiving compensation or anything of value from a firm, person, corporation, or other entity doing business with the agency
- using agency resources or credit for personal use or gain

The following activities, relating specifically to relationships with clients, also constitute conflicts of interest and are prohibited:

- accepting gifts or favors from a client or their family or providing gifts or favors to a client or their family except as authorized in the official performance of duties, not including the transfer of items normally associated with social matters
- developing relationships with clients other than those necessary in the normal conduct of business or using their position to become emotionally, physically, and/or personally involved with clients

Nominal gifts, such as advertising tokens or other expressions of appreciation, may be accepted. However, special care must always be taken to avoid even the impression of bias or a conflict of interest. No employee may solicit or accept gifts of significant value (i.e. in excess of \$50.00), lavish entertainment, or other benefits from clients, volunteers, attorneys, or any other party, individual, or entity.

Although staff members may take part in political campaigns of a partisan nature as individual citizens, no staff member may use their position with the agency to influence or affect the results of an election. This includes the use of agency letterhead to endorse a political candidate or support a particular position on legislation or referenda. Such action can cause the agency to lose its nonprofit status.

Employees who violate this policy are subject to disciplinary action, up to and including termination.

### *Policy*

The Board of Directors of The Center for Children and Families, Inc. seeks to ensure that all directors and employees of The Center for Children and Families, Inc. act in the best interest of The Center for Children and Families, Inc.

### *Definitions*

1. **Duty of care** means the obligation to attend, participate in decisions, and be reasonably informed on matters relating to board decisions by giving diligent attention to matters before the board, participating in deliberations of the board, keeping informed of the business of, and exercising independent judgment on decisions that come before the board.
2. **Duty of loyalty** means the obligation to exercise the power of the board and its directors in the interest of The Center for Children and Families, Inc. rather than in their own or anyone else's interest.
3. **Conflict of interest** means an interest or situation which causes the person with the duties of care and loyalty to violate either or both of those duties. An example of a conflict of interest relating to the duty of care is relying on someone else's judgment when voting at a board meeting because you did not make yourself aware of the issues. An example of conflict relating to the duty of loyalty is proposes or voting on The Center for Children and Families, Inc. entering a contract with an entity in which you have some interest.
4. **Disclose/disclosure** means to make the **conflict of interest** or potential **conflict of interest** known and document the same. The **disclosure** should be a full **disclosure** in that it includes the nature and extent of the conflicting interest.

### *Procedure*

1. 1. A director and the staff members of The Center for Children and Families, Inc. shall review annually this policy and procedure and acknowledge the same in writing on the Certification attached hereto and made a part hereof as Exhibit A.
2. 2. A director and staff member shall recognize and **disclose** any **conflict of interest** or potential **conflict of interest** as the conflict becomes known to the director. Further, it is the obligation of the director or staff member to **disclose** any **conflict of interest** or potential **conflict of interest** at every meeting in which any action is proposed on the matter that presents the conflict.
3. All **disclosures** should be documented either in writing to the board of directors. This written **disclosure** may be accomplished through letter, the

Certification, or through detailed documentation in the minutes of the **disclosure**.

4. A director or staff member who has a **conflict of interest** shall not take part in any discussion, debate, or vote on the item of business. A director or staff member may choose to treat a potential **conflict of interest** as a true **conflict of interest** and excuse himself from the discussion, debate, or vote on the item of business involved in any potential **conflict of interest**.
5. A director or staff member may voluntarily excuse himself from the meeting until the item of business involved in the **conflict of interest** or potential **conflict of interest** is completed. A director of the board may move that the director or staff member with a **conflict of interest** leave the meeting until the item of business involved in the conflict be completed. If such motion passes, the director or staff member shall leave the meeting until being invited to return at the conclusion of that matter.