

## **CONFLICT OF INTEREST**

### **PURPOSE**

To protect the integrity of the Agency information, products, services and employee efforts and to reduce the risk of litigation.

### **SCOPE**

This policy applies to all The Center for Family and Child Enrichment employees.

### **POLICY**

Employees are expected to devote their best efforts to the interests of the Agency and the conduct of its affairs. The Agency recognizes the right of employees to engage in activities outside of their employment which are of a private nature and unrelated to corporate business. However, a policy of full disclosure will be followed to assess and prevent potential conflicts of interest from arising.

The policy is to protect the integrity of the Agency's information, products, services and Board and staff efforts, and to reduce the risk of litigation.

No benefits are to accrue to the members of the Board of Directors as a result of service on the Board. Employees have an obligation to devote full time to employment with the agency and may not engage in any outside professional work without the approval of the President & CEO. No outside work is to be engaged in during normal agency business hours. No agency facilities, equipment, labor or supplies may be used to conduct outside employment business.

No Director, employee or members of his/her immediate family, may directly or indirectly borrow from, lend to, invest in or engage in any substantial transaction with a potential customer, client or supplier.

Any prior financial interest in any potential customer, client, supplier, or contractor must be disclosed to the agency.

No employee is to directly supervise a member of his/her family.

No employee may provide professional services to clients of the agency as a private consumer of said services for up to one year following termination of services by this agency. No clients are to be referred to employees by agency personnel.

While describing all the circumstances and conditions which might develop is impossible, the following is set forth to guide employees:

Employees have an obligation to devote full-time to employment with the Agency and may not engage in any outside professional work without approval of the Executive Director. No employee may engage in outside work that will interfere with his or her primary job with the Agency. Nor will any employee engage in any activity of a nature that is in some way hostile or adverse to The Center for Family and Child Enrichment.

A staff person may engage in private practice if there is no conflict of interest as determined by the Executive Director. Conflict of interest shall be grounds for disciplinary action including termination. The Agency encourages that a staff person in private practice meet the minimum requirements as set forth by the appropriate professional bodies, or as prescribed by State Law. So as to avoid conflict of interest, the officials and other facilities (including telephones) of CFCE, will not be used by staff for the purpose of private practice.

No outside work may be done during regular office hours and no Agency facilities, equipment, labor or supplies are to be used to conduct this outside activity.

Any employee doing any outside work is under obligation to advise his or her client that the work is in no way by, or in the name of The Center for Family and Child Enrichment.

No employee, or members of his or her immediate family, may directly or indirectly borrow from, lend to, invest in or engage in any substantial financial transaction with a potential customer, client or supplier. If a prior relationship exists the employee must inform the Agency.

Employees are prohibited from accepting gifts from clients or business associates, including food, clothing, etc., whose value exceeds five dollars.

Any questions regarding a possible conflict of interest or outside work should be discussed with the immediate supervisor and with the President & CEO.

Failure to disclose or discuss information related to any of the above points may lead to corrective action up to and including discharge.