

**PURCHSING AND CONTRACTING:
PROCUREMENT STAFF CODE OF CONDUCT**

Conflict of Interest

All employees of the Caswell School Department shall perform their duties in a manner free from conflict of interest to assure the proper performance of school business as well as to earn and keep public confidence. No employee of Dawn F. Barnes Elementary School with a real or an apparent conflict of interest in a proposed transaction shall participate in the selection, award or administration of a contract pursuant to the transaction.

Conflict of interest is defined as when an interested party has a financial interest in the firm selected for the award. Interested party is defined as 1) the employee; 2) a member of the employee's immediate family; 3) his/her partner; or 4) an organization that employees, or is about to employ a person described above.

Conflict of Interest Disclosure

All employees with a real or apparent conflict of interest as defined above must disclose the conflict of interest to the superintendent of schools who will investigate the circumstances of the transaction. The superintendent of schools will exercise due diligence in investigating the circumstances of the transaction and if necessary, will make reasonable efforts to find alternatives to the proposed transaction or arrangement that would not give rise to a conflict of interest. If the superintendent of schools determines that the proposed transaction is in the best interest of the school and is fair and reasonable, it may proceed with the transaction. In the event that the superintendent of schools may have a conflict of interest, an adjunct committee of the school committee will investigate and make a determination regarding the transaction.

Violations

Employees of the Caswell School Department who violate this code of conduct may be subject to discipline, up to and including termination of employment, and if appropriate, referral to law enforcement.

Legal Reference: EDGAR Part 74 Title 34 – Administration of Grants and Agreements
 EDGAR Part 80 Subpart C, Section 80.20, 80.36
 DOE Admin. Letter 6 – 9/19/06 – NCLB Fiscal Compliance

Cross Reference: BCB – School Committee Member Conflict of Interest
 DJ – Bidding/Purchasing Requirements
 DJG – Vendor Relations
 GBI – Staff Gifts and Solicitations
 KH- Public Gifts to the School

Adopted: April 30, 2008