| Adoption Date: | 10/21/2024 |
|-------------------|------------|
| Revision Date(s): | 11/17/2024 |



Board Policy 7.7

Employee Conflict of Interest Policy

THIS POLICY IS INTENDED TO PROVIDE A GENERAL STANDARD OF CONDUCT WITH RESPECT TO ACTUAL OR APPARENT CONFLICTS OF INTEREST, in keeping with the Pennsylvania Public Official and Employee Ethics Law and the State Legislature's declaration that the citizens have the right to be assured that the financial interests of public officers or employees do not conflict with the public trust.

Definition

Conflict of Interest - Use by a public official or public employee of the authority of his/her office or employment or any confidential information received through his/her holding public office or employment for the private pecuniary benefit of himself/herself, a member of his/her immediate family or a business with which he/she or a member of his/her immediate family is associated. The term does not include an action having a de minimis economic impact or which affects to the same degree a class consisting of the general public or a subclass consisting of an industry, occupation or other group which includes the public official or public employee, a member of his/her immediate family or a business with which he/she or a member of his immediate family is associated.

Standards of Conduct

Employees may not engage in conduct that constitutes a conflict of interest under or is otherwise in violation of the Pennsylvania Public Official and Employee Ethics Act (65 Pa.C.S. §1101 et seq).

Employees may not participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, directly financially benefits from, receives compensation from, or otherwise benefits directly, through goods or services, from such organization. or a tangible personal benefit from a contractor or firm considered for a contract.

Employees may not accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts, unless the gift is an unsolicited item of nominal value. Examples gifts of nominal value are t-shirts, calendars, pencils, branded inexpensive pens and other inexpensive promotional items. Examples of gifts of more than nominal value given to a library employee may include, but are not limited to, money, service, loan, travel, lodging, meals, refreshments, entertainment, discount, or promise to do or not do something having a monetary value.

Employees may not accept honorariums.

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Reporting Conflicts of Interest

Any individual with an actual, apparent or potential conflict of interest must promptly report it to the Executive Director. In the event that the Executive Director has an actual, apparent or potential conflict of interest, he/she shall report it to the Board President. For the purposes of this Policy, "immediate family" shall mean an individual's spouse, parent(s), and children.

Procedure for when a Conflict of Interest Exists

Where a true conflict of interest exists, the employee involved in the conflict shall not be involved in any part of the contract process, including soliciting and/or reviewing bids/telephonic quotes and/or finalizing a contract. The Executive Director shall ensure that an alternate individual handles all matters related to such contract. The Executive Director may, at his/her discretion, require such recusal in the case of an apparent or potential conflict of interest, as well.

Policy Violation

Individuals who violate this Policy may be subject to disciplinary action up to and including termination.

Annual Review

This policy shall be reviewed with employees annually.