**STAFF CONFLICT OF INTEREST**

The Cooperative expects that employees will perform their duties conscientiously, honestly, and in accordance with the best interest of the Cooperative, its students, parents and patrons. Employees of the Cooperative will not engage, directly or indirectly, in any activity that conflicts (or raises a reasonable question of conflict) with their duties and responsibilities performed for the Cooperative.

Employees must not use their position or the knowledge gained as a result of their positon for private or personal advantage. Employees will not engage in work of any type where information concerning customer, client, or employer originates from any information available to them through Cooperative sources.

Employees will not sell textbooks, instructional supplies, equipment, reference books, or any other educationally related products to the Cooperative, member districts of the Cooperative or students or parents of students served through the Cooperative*.*

Assets of the Cooperative are for Cooperative purposes only and not for personal benefit. This includes the personal use of Cooperative assets, such as materials, software, computers, and other equipment. Employment outside of the Cooperative must not create distractions or require time while on Cooperative contract time.

Employees must disclose actual or potential conflicts to the Director in writing as soon as they become aware of them.  Reoccurring actual or potential conflicts must be disclosed annually in writing to the Director. Contracts for outside employment involving use of the employee’s professional credentials will be filed with the Director. Failure to make required disclosures or to resolve conflicts of interest satisfactorily can result in discipline up to and including termination of employment.

A conflict of interest can also arise when a Cooperative employee, or a member of the employee’s immediate family, has an interest in a contract or receives a direct benefit from a contract where the Cooperative is a party to the contract. Disclosure of the potential conflict can resolve the issue while failure to disclose the potential conflict is a violation of this policy.

When employees become aware of an actual or potential conflict they must complete the approved disclosure form and submit it to the Director (and annually thereafter - by August 1st).

Steps in the approval process:

1. The Director will review, make findings, and determine, as an initial matter if an actual conflict as described in this policy exists, and if so, whether it can be waived.
2. This initial determination will be transmitted to the Advisory Board of Superintendents for review. In the event that the next board meeting is a combined Advisory Board and Board of Director’s meeting, the Advisory Board step may be skipped.
3. Upon review by the Advisory Board, the Director’s initial determination will be provided to the Board of Directors for review and final action at its next meeting.

If the initial determination is that there is no conflict or that the conflict can be waived, no further action is required by the employee. If at the administrative stage (Director or Advisory Board) of the procedure it is determined that there is a conflict that cannot be waived, the employee must desist from performing the conflicting activity until the Board of Directors has made a final determination. In such situation if no Board of Directors meeting is scheduled within (10) calendar days, a special meeting of the Board of Directors will be convened to decide the matter. The meeting can take place outside of (10) calendar days if agreed upon by both parties. The affected employee may be heard at the Board of Director’s meeting. If the Board of Directors determines that the conflict cannot be waived, their decision is final. The affected employee could appeal the decision to circuit court.

Adopted: March 14, 2017

Amended: May 9, 2017

**STAFF CONFLICT OF INTEREST DISCLOSURE**

Date:

Name of the employee of the Cornbelt Educational Cooperative requesting the waiver:

Brief explanation of the potential conflict of interest:

Brief explanation of the essential terms of the contract(s) or transaction(s) from which a potential conflict of interest may arise, including:

(1) all parties to the contract

(2) the person’s role in the contract or transaction

(3) what professional credentials of the employee qualified the employee for this employment outside of the Cooperative

(4) the purpose(s)/objective(s) of the contract

(5) the consideration or benefit conferred or agreed to be conferred upon each party

(6) the length of time of the contract

(7) what, if any, Cooperative resources may be affected

 (8) any other relevant information

Brief explanation of how or why the transaction or the terms of the contract are fair, reasonable, and not contrary to the public interest such that a waiver should be granted.

Signature of Person Requesting Waiver: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**THIS IS A PUBLIC DOCUMENT** Adopted: March 14, 2017