

**Conflict of Interest policy**

**2016-17**

***As outlined in the Grant Agreement between South Carolina First Steps and Local First Steps Partnerships***

The Partnership expressly agrees that it has adopted and shall comply with the following policy:

The staff members of the Partnership are obligated to always act in the best interests of the Partnership. This obligation requires that any employee of the Partnership, in the performance of his or her duties, seek only the furtherance of the Partnership mission. At all times, employees of the Partnership are prohibited from using their job title, or the Partnership’s name or property, for private profit or benefit. Partnership Board members, officers, employees and agents may not use their association or employment with the Partnership to obtain an economic interest for themselves, a family member, an individual with whom they are associated, or a business with which they are associated; or make, participate in making, or in any way attempt to use their employment or association to influence a decision in which the Partnership Board member, officer, employee, agent, a family member, an individual with whom they are associated, or a business with which they are associated has an economic interest.

1. The officers, Board members, employees, or agents of the Partnership may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors/vendors of the Partnership. This is not intended to preclude bona-fide Partnership fund-raising activities of the Partnership.
2. No Board member, officer, employee, or agent of the Partnership shall participate in the selection, award, or administration of a purchase or agreement with a contractor or vendor where, to his or her knowledge, any of the following persons has a financial interest in the contractor or vendor:
   * + 1. The Partnership Board member, officer, employee, or agent;
       2. Any member of the immediate family of the Partnership board member, officer, employee, or agent;
       3. Any partner of the Partnership Board member, officer, employee, or agent;
       4. Any organization in which the Partnership Board member, officer, employee, or agent is an officer, director or employee;
       5. Any person or organization with whom the Partnership Board member, officer, employee, or agent is negotiating or has any arrangement concerning prospective employment.
       6. Any individual with whom the Board member, officer, employee or agent is associated; or any business with which they have an economic interest.
3. Disclosure – Any actual or potential conflict of interest shall be disclosed by the Partnership Board member, officer, employee, or agent concerned. A Board member, officer, employee, or agent who, in the discharge of Partnership responsibilities, is required to take an action or make a decision which affects an economic interest of himself or herself, a family member, an individual with whom he or she is associated, or a business with which he or she is associated shall:  
   1. Prepare a written statement describing the matter requiring action or decisions and the nature of his or her potential conflict of interest with respect to the action or decision;  
   2. Furnish a copy of the statement to his or her supervisor, if any, who shall assign the matter to another employee who does not have a potential conflict of interest.  
     
   If the potential conflict of interest pertains to a managing employee, the statement must be provided to the Partnership Board for consideration and resolution pursuant to Subsection D below.
4. Board Action – When a conflict of interest is relevant to a matter requiring action by the Partnership’s Board of Directors, the interested Partnership Board member, officer, employee or agent shall call it to the attention of the Partnership Board of Directors and such Partnership Board member, officer, employee or agent shall not be permitted by the Partnership to vote on the matter. In addition, the interested Partnership Board member, officer, employee or agent shall not be permitted to participate in the final deliberation or decision regarding the matter under consideration. When there is a doubt as to whether or not a conflict of interest exists, the matter shall be resolved by vote of the Partnership Board of Directors, excluding the -Partnership Board member, officer, employee, or agent who has the potential conflict of interest.
5. Record of Conflict – The official minutes of the Partnership Board of Directors shall reflect that the conflict of interest was disclosed, the interested Partnership Board member, officer, employee or agent did not vote on the matter, and the conflict was resolved by a vote consistent with this provision.
6. In no circumstances will any Partnership employee have under his or her supervision or in his or her chain of command, any member of his or her immediate family as defined in the South Carolina Ethics Act.