

CONFLICT OF INTEREST POLICY

Definition of Terms:

- **Employee** - means a person for which the Phoenix Education Foundation (Phoenix) is the primary employer.
- **Pecuniary interest** – means with respect to a person, an interest in a matter that could monetarily affect: the person, a corporation, other than a distributing corporation, in which the person is a shareholder, director or officer, a distributing corporation in which the person owns voting shares carrying at least 10% of voting right, a partnership or firm of which the person is a member.

Background:

The Board believes that the public has a right to educational services which are conducted with efficiency, impartiality, and integrity. It is also the special obligation which demands that there not be any conflict of interest between private interests of employees and their responsibility to the public.

Requirements:

1. Respecting outside employment, employees may take supplementary employment, including self-employment, unless such employment:
 - a. Is prohibited by contract;
 - b. Causes conflict of interest;
 - c. Interferes with regular employment duties;
 - d. Involves the use of school premises, equipment, or supplies;
 - e. Causes the employee to hold pecuniary interests that are in conflict of interest.
2. Where it appears that a conflict of interest might arise in taking supplementary employment, or through pecuniary interest, it is the duty of the employee to notify the board in writing, as to the nature of employment.
3. Employees shall not accept monetary or other payment in addition to normal salary or compensation or expenses for duties which they normally perform in the course of their contracted duties.
4. Employees who own, or have pecuniary interests in businesses that may act as a supplier to the Phoenix Education Foundation, shall be required to notify the board of their financial interest in a company when submitting a bid.
5. To avoid the risk of favoritism being shown or creating a perception of conflict of interest, employees in supervisory positions may not have direct relatives as employees under their direct and immediate supervision. Direct relatives shall be defined as spouse, children, parents, parents of spouse, siblings, nieces and nephews.

6. Products and materials developed as part of an employee's regular duties shall be property of the Phoenix Education Foundation, unless otherwise stated in contractual agreements.

Date Reviewed:

Feb. 19, 2015

March 10, 2022