



ETHICS POLICY
PROCEDURES

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**BOARD-ADOPTED
PROCEDURE**

I. Conflict of Interest Regulations

A. Gifts to District Employees

1. A District employee may not accept, directly or indirectly, any individual gift with a value in excess of \$100, or more than \$500 in total gifts over the course of a calendar year from any individual or commercial organization. Employees may accept individual gifts regardless of value: (a) from any non-profit or community based organization or charitable trust that are given in recognition of performance, merit, or accomplishment; or (b) from the employee's school community or co-workers upon retirement or transfer from the school, department, or District.
2. Notwithstanding subsection (1), a District employee who participates in the acquisition of goods or services by the District may not accept any gift from a person or firm seeking to or providing such goods or services, except for the following:
 - a. Advertising or promotional items of nominal value.
 - b. Informational material, publications, or subscriptions related to the recipient's performance of official duties.
 - c. Food and beverages consumed at hosted receptions or hosted meals where attendance is related to the recipient's performance of official duties.
3. No gift of any value may be accepted if the employee has reason to believe the donor expects any special consideration or service in return.
4. Employees who solicit or accept gifts on behalf of the District must follow the District's policy on handling gifts, donations, and fundraising proceeds (D14.00).

B. Compensation for Outside Activities



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1. Employees may receive compensation for outside activities, provided that the outside activity is done on the employees' non-work time, does not impair the employee's ability to carry out their District work assignments, and otherwise does not conflict with this policy.
2. District employees who participate in the acquisition of particular goods and services by the District shall not receive compensation for personal services rendered to or for any person or firm seeking to or providing those particular goods or services during the term of their District employment, unless information about the services and compensation is disclosed in writing to the Superintendent's designee and approved in writing by him or her beforehand.
3. No District employee shall solicit or accept outside compensation for performing or not performing Seattle School District work duties.

C. Using District Office to Induce or Coerce Gifts from Others

No District employee shall use his or her position with the District to induce or coerce another person to provide the District employee or any other person with any thing of economic value, to require or pressure any other person to purchase equipment, supplies, or services from the District employee, or to secure privileges or exemptions for himself or herself, or other person(s).

D. Financial Interest in Transaction

District employees shall not be financially interested, directly or indirectly, in any contract, sale, lease or purchase that may be made by, through, or under the supervision of the employee.

E. Use of Persons, Money or Property for Private Gain

District employees shall not use any person, money, or property under the employee's official control or direction, or in his or her official custody, for the private benefit or gain of the employee or his/her family, except under the following limited circumstances:

Employees may make occasional or limited use of District equipment or facilities for their personal benefit if there is a negligible cost to the District and if



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the use does not interfere with the employee's official duties or with another employee's performance of official duties. Examples of personal uses with a negligible cost to the District that would be acceptable are:

1. occasional use of office telephones for local calls;
2. occasional personal use of computers during breaks or after work hours;
3. limited personal e-mail;
4. occasional limited use of copiers; and
5. use of telephones for long distance calls for which the employee reimburses the District in accordance with District policy.

District cars are not included in this exception. District cars, absent prior agreement, should only be used for District business. Other District equipment that can only be used for District business includes machine tools, cleaning and painting equipment, and any other items that would wear out with use.

F. Use of Public or Donated Resources for Services or Enhancements for Private Benefit

Employees shall not use resources donated to the District to purchase enhanced goods or services (such as first class airline seats or a hotel room that costs more than the reimbursement guidelines) unless the enhanced good or service is authorized by a supervisor who has the authority to commit donated funds. Authorization may be given only if purchase of the enhancement is necessary to serve the interest of the District, and if the donor is aware that the donated resources may be used for enhanced goods or services.

G. Honorarium

An honorarium is money or a thing of value offered to a school district employee for a speech, appearance, article, or similar item or activity in connection with the employee's official role. School District employees are authorized to accept an honorarium unless the employee is aware that the person, company, or organization offering the honorarium is interested in selling goods or services to the District, and the District employee is in a position to influence the District's decision to acquire that type of good or service.

H. Disclosure of Privileged Information

No District employee may disclose or use any privileged or proprietary



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information gained by reason of his or her official position for a purpose other than a School District purpose; provided that nothing shall prohibit the disclosure or use of information which is a matter of public knowledge or which is available to the public on request. Privileged or proprietary information includes student records, personal employee information, property appraisals, and business information the disclosure of which would put the District at a competitive disadvantage.

II. Definitions

- A. **Assist** means to act, or offer or agree to act, in such a way as to help, aid, advise, furnish information to, or otherwise provide assistance to another person, believing that such action is of help, aid, advice, or assistance to such person and with intent to so assist such person.
- B. **Compensation** means any thing of economic value, however designated, which is paid, loaned, granted, or transferred, or to be paid, loaned, granted, or transferred for, or in consideration of, personal services to any person.
- C. **District action** means any action on the part of the District, including but not limited to any decision, determination, finding, ruling, order, grant, payment, award, license, contract, transaction, sanction, approval or denial.
- D. **Employee** means the District Superintendent or any individual who is appointed by the District's Superintendent or his or her designees and who serves under the supervision and authority of the District.
- E. **Family member** means spouse or domestic partner, child, step-child, parent, step-parent, parent-in-law, grandparent, grandchild, sibling, aunt, uncle, niece, nephew, son- or daughter-in law, brother- or sister-in law or first cousin.
- F. **Financial interest** means a creditor or ownership interest (including without limitation, ownership evidenced by stock purchase) in an amount or value in excess of \$1,500.00, or any employee, consultant or partnership arrangement; except that the term financial interest does not include an interest evidenced by less than one percent of the outstanding shares of a publicly traded corporation, or of the net worth of any other business entity.
- G. **Gift** means anything of economic value received from anyone for which no consideration is given. Gift does not include:



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1. Items from family members or friends where it is clear beyond a reasonable doubt that the gift was not made as part of any design to gain or maintain influence in the agency of which the recipient is an officer or employee;
 2. Items related to the outside business of the recipient that are customary and not related to the recipient's performance of official duties;
 3. Items exchanged among employees at a social event hosted or sponsored by a District employee for coworkers;
 4. Payments of reasonable expenses incurred in connection with a speech, presentation, or appearance made in an official capacity; provided such payments are approved in advance in writing from the employee's supervisor. As used in this subsection, "reasonable expenses" are limited to travel, lodging, and subsistence expenses incurred the day before through the day after the event.
 5. Payment of enrollment and course fees and reasonable travel expenses attributable to attending seminars and educational programs sponsored by a bona fide nonprofit professional, educational, or trade association, or charitable institution; provided such payments are approved in advance in writing from the employee's supervisor. As used in this subsection, "reasonable expenses" are limited to travel, lodging, and subsistence expenses incurred the day before through the day after the event;
 6. Discounts available to an individual as a member of an employee group, occupation or similar broad-based group;
 7. Awards, prizes, scholarships, or other items provided in recognition of academic or scientific achievement; and
 8. Personalized plaques, trophies, or similar awards given in recognition of performance, merit, or accomplishment, or upon retirement or transfer.
- H. **Participate** in connection with a transaction involving the District, means to participate personally and substantially, through approval, disapproval, decision, recommendation, the rendering of advice, or investigation. With



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regard to participating in the acquisition of goods and services, it specifically includes employees who participate in the textbook adoption process.

- I. **Person** means any individual, partnership, corporation, association, firm, institution, or other entity, whether or not operated for profit.
- J. **Responsibility** in connection with a transaction involving the District, means the direct administrative or operating authority, whether intermediate or final, and either exercisable alone, in conjunction with other District employees, or through subordinates, effective to approve, disapprove, or otherwise direct District action in respect of such transaction.
- K. **Thing of economic value** includes any loan, property interest, or interest in a contract, any employment or other arrangement involving a right to compensation, any option irrespective of the conditions to the exercise of such and any promise or undertaking for the present or future delivery or procurement.
- L. **Transaction involving the District** means any proceeding, application, submission, request for a ruling or other determination, contract, claim, case, or other such particular matter which the District employee or former District employee in question believes, or has reason to believe, is or will be the subject of District action; or is one to which the District is, or will be a party; or is one in which the District has a direct and substantial interest.

III. Advisory Opinions, Investigations, and Adjudication

A. Ethics Officer

The Superintendent shall designate a District Ethics Officer. The Ethics Officer may appoint internal or outside investigators and/or attorneys to assist in performing his or her responsibilities.

B. Interpretation of Guidelines/Advisory Opinions

Any District employee or a person in a transaction involving the District may request an advisory opinion from the Ethics Officer. All requests for an advisory opinion shall be submitted in writing to the Ethics Officer. The Ethics Officer shall make a good effort to respond in writing to all requests for an advisory opinion in a timely fashion or within thirty days after receiving the request.



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C. Investigation of Alleged Violations

1. Any person may submit a written complaint to the Ethics Officer specifying one or more violations of these Guidelines. Complaints should be signed by the person or persons submitting them, but unsigned complaints will be accepted. If requested, complainant's privacy will be observed where possible.
2. The Ethics Officer (or his or her appointee) shall be authorized to do any or all of the following: interview the complainant; provide an overview of the complaint to the subject of the complaint; interview and obtain a statement of facts from the subject of the complaint; identify and gather relevant documents; and identify other persons who might have relevant knowledge of the alleged violation.

Upon completion of the foregoing, the Ethics Officer shall prepare a Preliminary Report containing the results of the investigation and a recommendation as to discipline. The final decision with respect to discipline shall be handled like any other disciplinary matter, including the right to a meeting if discipline is proposed.

3. Any employee found to have violated any provision of these Guidelines may be subject to progressive disciplinary action.
4. Retaliation and threat of retaliation, both direct and indirect, against a complainant shall be prohibited. Any employee found to have engaged in any such conduct shall be subject to disciplinary action.

D. Implementation

1. This Ethics Policy/Procedure will take effect September 1, 2002. In the interim, the District shall disseminate these ethical requirements to all employees.
2. These ethical requirements shall apply in addition to any other applicable laws, regulations, and policies governing employee conduct.