

Ethics Office Frequently Asked Questions

The following represents questions that are frequently asked of the Ethics Office. Please keep in mind that the responses are generic and are intended to provide a general overview of the District's ethics guidelines. You may refer to the formal [Ethics Policy](#) on the [District's website](#) for additional information. If you have additional questions after reading this document, please contact the Ethics Office with specific questions to your situation at 206-252-0004 or ethics@seattleschools.org.

General Information

- **Is the Ethics Officer independent from Seattle Public Schools?**
The Ethics Office is a Seattle Public Schools department. However, to ensure independent and objective investigations, the Ethics Officer reports directly to the School Board. This allows investigations to be fair and objective, and it protects the Ethics Officer from any retribution.
- **What types of investigations does the Ethics Office conduct?**
The Ethics Office is responsible for investigations related to the District's Ethics Policy and any complaints involving whistleblower retaliation. Whistleblower complaints and other procedural violations may also be reported to the Ethics Office, however, based on the nature and complexity of the complaint, the investigation may be conducted by the Ethics Office or it may be referred to District management for investigation. All whistleblower complaints received by the Ethics Office are reviewed with the Chair of the Audit & Finance Committee to ensure appropriate assignment of the investigation.
- **Who conducts the actual investigations?**
The Ethics Office does not employ an investigator on staff. The Ethics Office contracts with independent investigators to conduct investigations specific to the District's Ethics Policy and investigations involving whistleblower retaliation. Whistleblower and other procedural complaints may be referred to District management to investigate or they may be conducted by an independent investigator depending on the nature and complexity of the complaint. Complaints will never be assigned to someone directly associated with the allegations, and all whistleblower complaints received by the Ethics Office are reviewed with the Chair of the Audit & Finance Committee to ensure appropriate assignment.

Gifts

- **Are District employees allowed to accept gifts?**
District employees may accept gifts as long as the gift does not create the appearance that the gift is intended to influence a District action. The general rule of thumb is that individual gifts under \$50 are acceptable. Multiple gifts under \$50 from the same person are also acceptable, as long as the total value of the gifts received does not exceed \$100 in a single school year.
- **Can a group of employees or community members join together to give a District employee a gift valued at more than \$50?**
Yes, joint gifts are acceptable as long as no single individual or student family contributed more than \$50 to the gift.

- Can I accept a free meal from a vendor or contractor?**
 Generally, no. If a vendor has a contract with the District or intends to pursue a future contract with the District, you should not accept any gifts from the vendor, including meals. The exception to this rule is if you have a personal relationship with the vendor and you are not involved in any District actions involving the vendor. For example, if your neighbor is a District vendor, it may be acceptable for your neighbor to buy your meal or provide you with another gift, as long as you have no official responsibilities related to the vendor.
- Can I accept a free meal while attending an event as part of my official District duties?**
 Yes, as long as the event is attended by people from multiple organizations and there is no indication that the meal is being provided with the specific intention to influence a District action. It is common to attend professional development or marketing events where meals are provided. It is ok to accept meals at these events as long as the event is open to multiple organizations and your supervisor agrees that this event is a worthy use of District time.
- Can I accept a prize that I won while attending an event as part of my official District duties?**
 Yes, as long as the event is attended by people from multiple organizations and the prize was awarded randomly. You should not accept the gift if you suspect that you were selected as a winner in order to influence your decision on a District action.

Outside Employment and Additional Compensation

- Are District employees allowed to seek outside employment?**
 Yes, District employees may obtain outside employment. Outside employment does not need to be pre-approved by the District, however, there are several considerations that employees must keep in mind:

 - You may not accept any compensation from an outside organization for performing services that are part of your job duties as a Seattle Public Schools employee. For example, if you are attending an event as a representative of Seattle Public Schools, then you cannot accept any additional compensation for attending the event or for speaking at the event.
 - If the outside organization employing you does any business with the District, then you must recuse yourself from participating in all District actions involving the outside organization.
 - You cannot misuse your position in order to obtain outside employment. Your access to District email and documentation should be used for District purposes only. Specifically, you cannot use your access to students in order to promote your outside services. You must follow the same procedures that any other vendor would be required to follow in order to market your services to District employees and students.
 - You may not use any District resources in the performance of your outside activities.
 - You may not divulge any confidential information while performing your outside services.
 - All outside services must be performed outside of your normal work hours or while you are on approved leave.
- Can a teacher accept outside compensation to tutor one of his or her students?**
 No, District employees cannot sell goods or services to students that are under their direction or control. Since teachers can direct which services are provided to students, and since teachers control student grades, it is unacceptable for them to provide outside services to the student or

their family. Such a situation could create the appearance that the payments are being provided to the teacher in order to influence the student's grades or services.

- **Can a teacher provide tutoring services to students that are not in his or her class?**
Yes, since the teacher does not have any direction or control over the students that are not part of the teacher's class, it is acceptable for the teacher to provide outside services to those students. Please see the additional considerations that apply to all outside employment activities above. See the question entitled: "Are District employees allowed to seek outside employment?"
- **Can a coach provide extra training to one of his or her athletes?**
No, District employees cannot sell goods or services to students that are under their direction or control. Since coaches control an athlete's playing time, it is unacceptable for them to provide outside services to the student or their family. Such a situation could create the appearance that the payments are being provided to the coach in order to influence how much playing time the student receives, or which position the student gets to play.

Volunteering

- **Can I volunteer to serve on the Board of an outside organization?**
Yes, District employees may volunteer with outside organizations, including serving on the Board of Directors of an outside organization, subject to the following considerations:
 - If the outside organization does any business with the District, then you must recuse yourself from participating in all District actions involving the outside organization.
 - You cannot use your position in order to benefit the outside organization. Your access to District email and documentation should be used for District purposes only.
 - You may not use any District resource in the performance of your volunteer activities.
 - You may not divulge any confidential information while performing your volunteer services.
 - All volunteer services must be performed outside of your normal work hours or while you are on approved leave.

Use of District Equipment and Resources

- **Is it acceptable to use District computers, email, copiers, telephones, etc. for personal reasons?**
Yes, District employees may make limited use of District resources for personal reasons as long as the use does not result in a significant cost to the District or interfere with the employee's performance.
- **Is it acceptable to use District computers, email, copiers, telephones, etc. to support or promote outside employment activities?**
No, District employees may not use District resources for any activity that results in a financial gain to the employee or their family. This includes not only employment activities, but also any activity that would result in a financial gain to the employee or their family. Prohibited items include using District resources to promote a personal Go Fund Me campaign or directing students to use a specific vendor in order to obtain personal rewards or discounts.

Travel

- **Can I accept free travel and registration to attend a vendor-sponsored event?**

This type of travel may be acceptable, however, should be reviewed by the Ethics Officer on a case-by-case basis. Please contact the Ethics Office to determine if your planned trip is acceptable.

Before calling, please review the following considerations and be prepared to discuss each one:

- Attendance at the event must be related to the employee's normal duties. Employees should provide written approval from their direct supervisor acknowledging that the supervisor approves attendance at this event and believes that it will be valuable to the District.
- The event should be targeted at multiple organizations, and each attending organization should be receiving the same benefits. There should be no indication that the event is targeting Seattle Public Schools in an effort to influence a District action.
- The travel expenses paid for by the event must be reasonable and consistent with the District's travel guidelines. You should only accept travel that the District would normally pay for, and any travel expenses beyond what is permitted by the District's travel guidelines could be considered a gift. Specifically, first class airfare and luxury accommodations are not permitted.
- Employees are not allowed to accept any gifts exceeding \$50 in value. This would include events such as, golf outings, show tickets, spa packages, etc. If any extracurricular or social events such as these are included on the agenda, the employee must pay for them with personal funds or decline to attend.
- Employees cannot divulge any confidential District information while attending the event.
- All future procurement involving a potential vendor associated with this event must be initiated with the District's purchasing or contracting services department to ensure that we are being transparent and fair to all potential vendors.
- Itemized receipts/invoices and other detailed records are maintained to document all expenses provided by the event, including a copy of the final event agenda.
- Lastly, the Ethics Policy requires that the reimbursement be memorialized in a public document. This can be accomplished with an email, or it can be documented in the Request for Professional Leave Form.

Other

- **Who should I contact with a question regarding the Ethics Policy, or to report a suspected Ethics violation?** You may call the Ethics Office at 206-252-0004 or email ethics@seattleschools.org