



POLICY: CONFLICT OF INTEREST

POLICY STATEMENT: To establish the ethical conduct of the governing board, staff, paid consultants and volunteers. To define conflict of interest standards for the CASA of Lewis & Clark and Broadwater Counties program.

DEFINITIONS:

1. Governing Board, staff, paid consultants and volunteers: No board director, staff, paid consultant or volunteer may participate in any decision making process when said person or members of her or his immediate family, or any party, group or organization to which said person has allegiance, may have an interest that may be seen as competing with the interests or concerns of the CASA of L & C and B Counties program.
2. Staff and volunteers: A CASA of L & C and B Counties staff member or volunteer should not provide direct service delivery to any parties that could: A. Lead to a conflict of interest or liability problems or B. Cause a child or family to become dependent on the person for services that should be provided by other agencies or organizations. A staff member or volunteer should not be related to any parties involved in a case or be employed in a position and/or agency that might result in a conflict of interest.

POLICY GUIDELINES:

1.A. Governing board and staff members must weigh carefully all circumstances in which there exists the possibility of accusations of competing interest. Governing board and staff members shall disclose to the board any possible conflict of interest and any and all relevant information pertaining to the possible conflict and may not participate in any decision making process related to the matter in which there may be a conflict of interest. Further, governing board and staff members shall excuse themselves from the room when there is any deliberation and decision on the matter of interest.

1.B. The minutes of the board and/or committee meetings shall reflect that the conflict of interest was disclosed and that the interested person was not present during the deliberation and decision on the matter of interest. In the event of possible conflict of interest in a decision making process at the level of management, the Program Director shall report to the board in writing that the conflict of interest was disclosed and that the interested person was not in the room and did not participate in the final deliberation and decision on the matter of interest.

1.C. Failure to disclose possible conflicts of interest in a timely manner will result in disciplinary action. The governing board, staff and volunteers will have the executive committee designate the disciplinary action to be taken up to and including dismissal. Paid consultants can have their service agreements terminated.

1.D. The CASA of L & C and B Counties program shall promptly refer to National CASA and the state CASA organization any credible evidence that a principal staff, agent, contractor, sub-grantee, subcontractor, or other persons has committed a criminal or civil violation of laws pertinent to fraud, conflict of interest, bribery, gratuity, or similar misconduct involving program funds.

1.E. The CASA of L & C and B Counties program's staff, volunteers and governing body members must immediately notify the Governing Board Executive Committee of any criminal charges filed against them.

1.F. The policy shall be reviewed at the first meeting of duly elected board members each year, annually with all staff and with each new member of the staff at the time of his or her hire. Copies of this policy shall be given to each board member and staff member and signed annually for the program file and personnel files. Copies will also be given to the volunteers and signed for their files during their orientation. Copies will be given to and signed by paid consultants at the time of establishing a service agreement with the CASA of L & C and B Counties program.

2.A. Examples of inappropriate staff and volunteer practices are:

- Taking a child to the staff or volunteer's home or shelter a child in the home.
- Give legal advice or therapeutic counsel.
- Make placement arrangements for the child.
- Give money or expensive gifts to the child or family.
- Introduce the child to your own family and friends.
- Provide transportation, visitation supervision or home studies without prior authorization. If transport, need liability insurance coverage to cover and written approval of the program director.
- Make promises you can't keep.
- Do not feed the child without prior approval of the primary care giver.

2.B. Failure to follow these practices will result in disciplinary action by the Program Director with an appeal process to the governing board executive committee possible. Disciplinary action can be taken up to and including dismissal.

5/01/13 Adopted

Date _____

Signature

Program Dir./President of Board