



Conflict of Interest Policy

The purpose of the following policy is to prevent the personal interests of Board members, employees, and volunteers from interfering with the performance of their duties to I-LEAD Charter School (ILCS) or resulting in personal financial, professional, or political gain on the part of such persons at the expense of ILCS.

Definitions

Conflict of Interest or *Conflict* means a conflict, or the appearance of a conflict, between the private interests and official responsibilities of a person in a position of trust.

Board means the Board of Trustees of ILCS.

Person in a position of trust means a Board member, officer, employee, or volunteer of ILCS.

Volunteer means a person other than a Board member who does not receive compensation for services and expertise provided to ILCS and retains a significant independent decision-making authority to commit resources of the organization.

Employee means a person who receives all or part of her or his income from the payroll of ILCS.

Policy

1. Full disclosure, by notice in writing, shall be made by the interested person in a position of trust to the full Board of Trustees in all cases of conflict of interest, including but not limited to the following:
 - a. A Board member is related to another Board member, or employee by blood, marriage, or domestic partnership.
 - b. An employee in a supervisory capacity is related to another employee whom she or he supervises.
 - c. A Board member or his or her organization stands to benefit from an ILCS transaction.
 - d. An employee receives payment from ILCS for a good or service other than as part of her or his regular job responsibilities or as reimbursement pursuant to ILCS bylaws and policy for expenses incurred by said employee.

- e. A Board member's organization receives grant funding from ILCS.
 - f. A Board member or employee is a member of the governing body of a contributor to ILCS.
 - g. A volunteer meets any of the criteria listed in subsections a through f above.
2. Following disclosure of a possible conflict of interest, the Board shall determine whether a conflict exists. If the Board determines that a conflict exists, it shall take such action as it deems necessary to address the conflict and protect ILCS's best interests. In making such determination and deciding whether to take any such action, the Board's decision shall be by a majority vote in which any interested Board member shall be ineligible to participate. Such vote shall be of full force and effect even if the disinterested members constitute less than a quorum.
 3. In the case of a potential conflict of interest with regard to the use of federal funds, the Board shall disclose the potential conflict to the awarding agency or pass-through entity.
 4. A Board member who is formally considering employment with ILCS shall take a temporary leave of absence from the Board until the employment position is filled. The Board member shall submit a written request for the said leave of absence to the Chair of the Board, c/o ILCS's Business Office, indicating the time period of the requested leave. The Chair shall submit the request to the Board for action, and the request and any action taken thereon shall be reflected in the minutes of the relevant Board meeting or meetings. The Board member requesting the leave of absence shall not participate in the deliberation or decision regarding the request, but he or she may be present to provide information unless a Board member present objects. The said Board member's term shall not be extended because of such leave.
 5. A Board member, employee, or volunteer shall not participate in any deliberation of the Board or any committee or subcommittee thereof in which the subject of deliberation is a contract, transaction, or other matter in which said individual has a perceived or actual conflict of interest. However, said individual may be present to provide information unless a Board member present objects.
 6. Any individual in a position to make a decision about spending ILCS's resources who also stands to benefit from that decision shall disclose that conflict as soon as it arises or becomes apparent. Such individual shall not participate in any decision regarding such spending.
 7. Any intentional failure to disclose a conflict shall be brought to the Board's attention upon discovery thereof, and the Board shall determine what if any action shall be taken. In making such determination, the Board's decision shall be by a majority vote in which any interested Board member shall be ineligible to participate. Such vote shall be of full force and effect even if the disinterested members constitute less than a quorum.
 8. Copies of this policy and the following Conflict of Interest Policy Affirmation and Disclosure Form shall be given to each Board member, employee, and volunteer of ILCS at the time of the official adoption of the Policy. Thereafter, each new Board member,

employee, and volunteer shall be given copies of the Policy and Form upon commencement of such individual's relationship with ILCS. Each Board member, employee, and volunteer shall sign and date the Form at the time of the Policy's adoption or at the beginning of her or his term of service or employment, as the case may be, and each year thereafter not later than September 30. Failure to sign does not nullify the policy. ILCS shall maintain on file copies of the signed Form for not less than one calendar year.



**I-LEAD Charter School
Conflict of Interest Policy Affirmation and Disclosure Form**

_____ I have no conflict of interest to report

_____ I have the following conflict of interest to report (please specify):

By my affixed signature I affirm that I have read and understand I-LEAD Charter School's Conflict of Interest Policy and its implications.

Signature

Printed Name

Date