

**Partnership for Children of Cumberland County, Inc.**  
**Human Resources Policies and Procedures**

**Employment Information – Rules of Conduct**  
**Section 521 – Conflicts of Interest**

**1. General Information**

- a. The Partnership for Children of Cumberland County, Inc. expects the primary interest of its employees to be the people served. A conflict of interest occurs when the personal interests of an employee interfere — or appear to interfere — with the employee’s ability to make sound business decisions on behalf of PFC.
- b. An actual or apparent conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that employee or for a relative as a result of PFC’s business dealings.
- c. This policy does not apply to employee relatives accessing PFC services.
- d. No “presumption of guilt” is created by the mere existence of a relationship with outside firms.

**2. Policies**

- a. If employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that they disclose to the President as soon as possible the existence of any actual or apparent conflict of interest so that safeguards can be established to protect all parties.
- b. Because of the appearance of undue influence, relatives of PFC employees are prohibited from participating in any transactions involving purchases, contracts or leases where PFC is a party.
- c. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.
- d. Personal gain may result not only in cases where an employee or relative has a significant ownership in a firm with which PFC does business, but also when an employee or relative receives any kickback, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving PFC.

OUTSIDE BUSINESS INTERESTS:

- e. Employees may have outside business interests and outside employment so long as these do not interfere with job performance.
- f. Employees may not earn profit from outside employment or business interests that directly results from affiliation with PFC.
- g. If an employee elects to conduct outside employment, no PFC resources, including offices, materials, or equipment may be used.
- h. All outside employment must be conducted exclusive of assigned PFC’s actual working time. See Section 511 – Outside Employment for further information.

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GIFTS, GRATUITIES:

- i. Employees are not to accept gifts, gratuities, free trips, personal property or other items of more than de minimis value from any outside person or organization as an inducement to provide services.
- j. Any gift of real or perceived value in excess of \$25 from an employment-related individual or business should be reported to the employee's department head. The department head will notify the President.
- k. Gifts, meals and similar items provided by vendors or consultants at a conference or meeting or that occur during the normal course of business relations are acceptable.

PERSONAL BELIEFS:

- l. PFC recognizes that its employees may hold a wide range of personal beliefs, values and commitments. These beliefs, values and commitments are a conflict of interest only when they prevent employees from making sound business decisions; if employees attempt to use actual working time and facilities for furthering them; or if employees continue attempting to convince others of their personal beliefs after they have been asked to stop.

**3. Exclusion**

- a. Nothing in this policy is intended to interfere with employees' rights to engage in concerted activity to address or improve working conditions.