

First Start Partnerships for Children & Families

Conflict of Interest Disclosure Statement

In the course of business, situations may arise in which a FSP decision-maker has a conflict of interest, or in which the process of making a decision may create an appearance of a conflict of interest.

All directors and employees have an obligation to:

1. Avoid conflicts of interest, or the appearance of conflicts, between their personal interests and those of FSP in dealing with outside entities or individuals.
2. Disclose real and apparent conflicts of interests to the Board of Directors, and
3. Refrain from participation in decisions on matters that involve a real conflict of interest or the appearance of a conflict.

What Constitutes a Conflict of Interest

All employees and directors of First Start Partnerships for Children & Families. owe a duty of loyalty to FSP. This duty necessitates that in serving FSP they act solely in the interests of FSP, not their personal interests or in the interests of others.

The persons covered under this policy shall hereinafter be referred to as “interested persons.” Interested persons include all members of the Board of Directors and all employees as well as persons with the following relationships to directors or employees:

1. Spouses or domestic partners
2. Brothers and sisters
3. Parents, children, grandchildren, and great-grandchildren
4. Spouses of individuals listed in 2 and 3
5. Corporations, partnerships, limited liability companies (LLCs), and other forms of businesses in which an employee or director, either individually or in combination with individuals listed in 1, 2, 3, or 4, collectively possess a 5% or more ownership or beneficial interest

Conflicts of interest arise when the interests of an interested party may be seen as competing with those of FSP. Conflicts of interests may be financial (where an interested party benefits financially directly or indirectly) or nonfinancial (e.g., seeking preferential treatment, using confidential information).

A conflict of interest arises when a director or employee involved in making a decision is in the position to benefit, directly or indirectly, from his/her dealings with FSP or person conducting business with FSP. (A potential conflict of interest exists when the director or employee, or

his/her immediate family { spouse, children, brother, sister and spouses of children, brother, or sister } owes/receives more than 1% of the benefiting business/profits.)

Examples of conflicts of interest include, but are not limited to, situations in which a director or employee:

1. Negotiates or approves a contract, purchase, or lease on behalf of FSP and has a direct or Administrative interest in, or receives personal benefit from, the entity or the individual providing the goods or services;
2. Negotiates or approves a contract, sale or lease on behalf of FSP and has a direct or Administrative interest in, or receives personal benefit from, the entity or the individual receiving the goods or services;
3. Employs or approves the employment of, or supervises a person who is an immediate family member of the director or employee;
4. Sells products or services in competition with FSP;
5. Uses FSP's facilities, other assets, employees, or other resources for personal gain;
6. Receives a substantial gift from a contractor, if the director or employee is responsible for initiating or approving purchases from that contractor.

Name: _____

Capacity:

_____ Board of Directors

Are you an Officer? Yes No

If Yes, which Officer position do you hold: _____

_____ Committee Member

_____ Employee (Position): _____

_____ Volunteer / Community Representative

I affirm the following:

_____ I have received a copy of the First Start Partnerships for Children & Families Conflict of Interest Policy.

_____ I have read and understand the policy and I agree to comply with the policy

_____ I have received a copy of the contractor list with whom Franklin County Head Start Program, Inc. has conducted business with during the preceding fiscal year.

_____ I understand that First Start Partnerships for Children & Families is a nonprofit organization and in order to maintain its federal exemption it must engage primarily in activities which accomplish one or more tax-exempt purposes.

Disclosures:

Yes No Are you an officer of an organization that conducts business or has a relationship with First Start Partnerships for Children & Families?

If yes, please define: _____

Yes No Have you ever served on the board of a business which First Start Partnerships for Children & Families invests?

If yes, please define: _____

Yes No Do you or any of your interested persons have any financial interest (current or potential), including a compensation arrangement as defined in the Conflict of Interest Policy of First Start Partnerships for Children & Families

If yes, please describe it: _____

If yes, has the financial interest been disclosed, as provided in the conflict of interest policy? Yes No

Yes No In the past, have you or any of your interested persons had a financial interest, including a compensation arrangement, as defined in the Conflict of Interest Policy of First Start Partnerships for Children & Families

If yes, please describe it, including when: _____

If yes, had the financial interest been disclosed, as provided in the conflict of interest policy? Yes No

Yes No In the past year, have you or any of your interested persons provided services or property to First Start Partnerships for Children & Families defined in the Conflict of Interest Policy of First Start Partnerships for Children & Families

If yes, please describe the nature of the services or property. If an interested person is involved please provide the identity and relationship:

If yes, had the services or property been disclosed, as provided in the conflict of interest policy? Yes No

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest between First Start Partnerships for Children & Families and your personal interests, financial or otherwise:

_____ I have no conflict of interest to report

_____ I have the following conflict of interest to report.

1. _____
2. _____
3. _____
4. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the conflict of interest policy of First Start Partnerships for Children & Families I agree that if I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with this policy, I will notify the Finance Director or the Finance Committee.

Signature

Date

Date reviewed by Finance Director/Finance Committee Chair: _____

**Finance Director / Finance Committee Chair
Comments and Recommended Actions**

_____ To the best of my knowledge, there is no perceived or inappropriate activity or conflict.

_____ I have reviewed this disclosure and recommend the following actions be taken:

Signature – Finance Director / Finance Committee Chair

Date