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Background

As a District, we are committed to achieving our strategic priority of Responsible Stewardship by ensuring a culture of integrity, transparency and accountability.

To this end, all employees are required by District policy to disclose potential conflicts of interest, or any situation which may impair your ability to perform your duties in a fair and impartial manner. In addition, employees must disclose criminal charges and convictions so the District can screen for certain listed offenses as mandated by the Michigan Department of Education.

Disclosures are an opportunity for you to be transparent about a potential conflict of interest and provides the District with the ability to proactively address issues related to ethics at an early stage.

The process for completing disclosures occurs in three steps:

1. All employees **acknowledge** key policies;
2. All employees **disclose** information required by policy;
3. Responses are **reviewed and managed** by District administrators.

This guide is intended to serve as a quick reference tool to answer questions about disclosure requirements and accessing disclosure forms on PeopleSoft HCM.

Key Terms

**Conflict of Interest**: a situation when an individual has a financial interest, directly, or indirectly, that could in some way impair one’s fairness and impartiality on the job.

**Disclosure**: a statement providing the nature and details of a conflict or other situation.

**Family Member**: parents, children, uncle, aunt, cousin, nephew, niece, spouse, domestic partner, grandparents, all family members by marriage or by adoption including in-laws and “step” family members, half-brother, half-sister or person who resides in the same household of any employee or Board member.

**Financial Interest**: income, honoraria, payment for service (including consulting services) or equity such as stock, stock options or other ownership interests and royalties.

**Nominal Value**: a monetary value of $100 or less.

**Other Interests**: occurs when an individual has an interest that could in some way impair one’s fairness and impartiality on the job.

**Personnel Action**: any action which influences a staff member’s employment status or standing with the District.
A conflict of interest occurs when you have any interest which may interfere with your ability to perform your duties in an impartial manner, or which may conflict with the interests of the District. The following list provides a summary of all potential conflicts you are required to disclose.

<table>
<thead>
<tr>
<th>Type of Conflict</th>
<th>You must disclose when you...</th>
<th>Examples</th>
<th>*Potential Outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Relationship with a Vendor</td>
<td>... or a family member have any relationship with or financial interest in a District vendor.</td>
<td>• Owning stocks or stock options&lt;br&gt;• Employment of a family member&lt;br&gt;• Having an ownership interest&lt;br&gt;• Financial royalties</td>
<td>The District will ensure that you do not have direct supervisory authority over this vendor and will release the vendor if this is not possible.</td>
</tr>
<tr>
<td>Gift from a Vendor</td>
<td>... or a family member accept or receive a gift from a vendor.</td>
<td>• Travel expenses&lt;br&gt;• Tickets to a sporting event&lt;br&gt;• Gift baskets&lt;br&gt;• Gift cards or cash</td>
<td>District policy limits the acceptance of gifts. You may be asked to return certain gifts or, depending on the nature of the gift and the reason it was given, you may be subject to disciplinary action up to and including termination.</td>
</tr>
<tr>
<td>Outside Employment</td>
<td>... receive income through a source of employment outside the District.</td>
<td>• Second job&lt;br&gt;• Self-owned business&lt;br&gt;• Tutoring</td>
<td>There is likely no action that will be taken as long as your work schedules do not conflict.</td>
</tr>
<tr>
<td>Outside Activities</td>
<td>... participate in an activity which may conflict with the interests of the District.</td>
<td>• Board membership on a non-profit&lt;br&gt;• Publishing articles or research for an outside publication&lt;br&gt;• Interest in property or leased assets to the District</td>
<td>There is likely no action that will be taken as long as your work schedule and/or the outside activities do not create a conflict of interest. In the rare case of a conflict, you may be asked to stop the activity.</td>
</tr>
<tr>
<td>Staff Gifts</td>
<td>... accept or receive a gift of value greater than $50 from a student or parent.</td>
<td>• Gift cards&lt;br&gt;• Electronic devices</td>
<td>District policy limits the acceptance of gifts. You may be asked to return certain gifts or, depending on the nature of the gift and the reason it was given you, be subject to disciplinary action up to and including termination.</td>
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</table>
| Nepotism         | ... have a reporting relationship with a family member, you influence a personnel decision which impacts your family member, or vice-versa. | Influencing any of the following actions which affect a family member:  
- Hire  
- Promotion  
- Change of assignment or transfer  
- Appointment to special committee or post  
- Dismissal  
- Employee Discipline  
- Evaluation | In cases where a staff member is supervising their family member, one person in the reporting relationship will be reassigned. |

*This list is not exhaustive but provides some examples*
Criminal Charges and Convictions

District employees are required to self-report within forty-eight (48) hours any arrest, arraignment or charge, other than a minor traffic violation.

The Michigan Department of Education prohibits individuals convicted of following crimes from working in a school or school district:

- Crime listed under Section 2 of the Sex Offender Registry Act, M.C.L. 28.722;
- Felony of any kind;
- Misdemeanor related to child abuse or a controlled substance.

For a complete list of offenses, consult MDE Criminal Convictions.

Employees who have been charged but not convicted (found guilty) of any of the above crimes may be placed on unpaid administrative leave until a “guilty” or “not guilty” decision has been reached. The Superintendent may also decide to place an employee charged with any other misdemeanor on administrative leave based on the potential to endanger children. If an employee is found “not guilty” after being placed on administrative leave, s/he will be compensated retroactively for days missed during the leave period.

Employees who have been convicted will be given the opportunity to go before the Personnel Security Advisory Committee (PSAC) to present information related to the conviction. The Superintendent shall make the final determination of action based on the recommendation of the PSAC.

Completing Disclosures

Employees will be asked to make a complete set of disclosures 1) during employee onboarding, 2) one time annually, and 3) as necessary when a conflict or criminal charge arises which you are required to disclose.

Google Chrome is the preferred browser to access Electronic Policy Disclosures.

1. Select the “Electronic Policy Disclosures” tile on the PeopleSoft HCM Employee Self Service Portal.
2. **Certify your receipt of the Employee Handbook and Conflict of Interest Policies. To download a copy of the Handbook/Policy, right click to “Save As” a PDF.**

3. **On the disclosure pages, read the policy and respond “Yes” or “No” to the Screening Question.**
4. If you respond "Yes" to the Screening Question, complete the Disclosure Information prompts.

5. Certify that your responses and click NEXT.
6. On the “Final Submission Tab,” check that all disclosures are complete and SUBMIT for review.

7. Confirm that your responses have been submitted.

Contact Information

For questions, concerns or comments regarding policy acknowledgement or disclosures, contact the Office of Employee Relations:

Program Manager
Carrie Bryant, Deputy Executive Director of Employee Relations
employee.relations@detroitk12.org

Technical Assistance
DPSCD Service Desk
service.desk@detroitk12.org