

Policy: Conflict of Interest Policy (for website)

Board Approved/Effective Date: 9 June 2025

## 1. General Policy Statement

The Salish Sea School is committed to high standards of integrity, fairness, and ethical conduct. This policy ensures decisions are made in the organization's best interests and public trust is preserved. It applies to all individuals affiliated with The Salish Sea School, including employees, contractors, interns, volunteers, committee members, and board members. Each person must avoid actual or perceived conflicts of interest and disclose any situation that may compromise — or appear to compromise — independent judgment. Definitions are in Appendix A.

## 2. Conflict of Interest Guidelines

All individuals are expected to adhere to the following principles to ensure transparency, fairness, and integrity in all organizational matters:

- a. **Financial Interest**: Avoid direct or indirect financial interests in organizational assets, leases, transactions, or contracts unless properly disclosed and reviewed.
- b. **Disclosure**: Submit a signed disclosure form at onboarding and update it if circumstances change. All conflicts or potential conflicts must be reported to the Board and documented.
- c. **Decision-Making**: Anyone with a conflict must recuse themselves from related decisions, votes, or discussions including those potentially benefiting themselves or family members.
- d. **Legacy Transactions**: The organization recognizes that some founding-phase assets or services (e.g., a personal vessel later purchased by the organization) originated from individuals involved with the school. These must be fully disclosed, reviewed, and documented by the Board.
- e. **Compensation for Referrals**: Payment or benefits in exchange for referrals to or from the organization are prohibited.

## f. Gifts and Favors:

- Individuals may not solicit gifts or favors from program participants or families.
- Small, unsolicited tokens (e.g., cards or handmade items) may be accepted at the Executive Director's discretion if of minimal value and no perceived obligation.
- Gifts must not exceed \$50 per calendar year from a single source, consistent with Washington State ethics guidelines (RCW 42.52.150).
- Acceptance of tips is generally discouraged and must be approved by the Executive Director in advance.
- g. **Preferential Treatment**: Staff, board members, volunteers, and their relatives may not receive special access to programs or services. All applicants must be treated equitably.
- h. **Confidentiality**: Confidential or proprietary information must not be used for personal gain. All individuals must sign a Confidentiality Agreement.



- i. **Use of Resources**: Use of school equipment, space, or staff time for personal purposes requires written approval from the Executive Director or Board President.
- j. **Employment and Nepotism**: Relatives may volunteer or participate in activities, but hiring and promotions must be based solely on merit. Any relationships with potential for bias—particularly in financial or supervisory roles—must be disclosed to the Board.
- k. **Vendor Selection**: Vendors and contractors must be selected fairly, using competitive bidding where appropriate, to avoid favoritism or appearance of impropriety.

## **Definitions**

**Board and committee members**: All officially appointed members of The Salish Sea School's Board of Directors or standing/ad hoc committees.

**Employee, consultant, volunteer, contractor, intern**: Any approved full- or part-time individual providing services to The Salish Sea School under any formal or informal agreement.

**Conflict of Interest**: A situation or transaction that compromises—or appears to compromise—the integrity or objectivity of an individual in their relationship with The Salish Sea School. Conflicts may arise from:

- Outside business or financial relationships
- Dual employment that affects job performance or objectivity
- Preferential treatment of relatives in hiring, contracting, or service access

**Relatives**: Individuals related by blood, marriage, adoption, or guardianship, including spouses, children, parents, siblings, or any person residing in the same household.

**Steering/Referring**: The act of directing or recommending program participants to — or from — any other provider, individual, or organization in exchange for payment, consideration, or other benefit.