



VOYAGER: A PUBLIC CHARTER SCHOOL

“The Journey of Learning Never Ends”

POLICY NO.	DESCRIPTION	EFFECTIVE DATE
002	PRINCIPLES OF ETHICAL CONDUCT, CONFLICTS OF INTEREST, AND NEPOTISM	3/12/15

PURPOSE:

To establish Voyager: A Public Charter School’s (hereinafter referred to as the “School” or “Voyager”) Principles of Ethical Conduct. It also outlines policies and practices to ensure the School’s employees and Governing Board Members are performing their duties in a fair and unbiased manner, and that the public funds entrusted to them are managed and administered in accordance with the State of Hawaii Code of Ethics established in Hawaii Revised Statutes (HRS) Chapter 84.

A. PRINCIPLES OF ETHICAL CONDUCT

Employees, Governing Board members, contracted personnel and volunteers of the School must adhere to the following principles of ethical conduct so that the stakeholders and general public have justifiable trust and confidence in the integrity of the School. These principles require that relevant parties recognize that the School’s interest is the primary concern, and those parties discharge their duties accordingly. Violation of these principles may result in disciplinary action, up to termination of employment or removal from office.

1. Service to the School and the public is placed above personal gain or loyalty.
2. Relevant parties are prohibited from accepting gifts that would compromise their ability to exercise impartial judgment on behalf of the School and the public.
3. Honest, earnest effort and best thought will be given to the performance of duties.
4. All persons will be treated with dignity, respect and courtesy. Relevant parties will listen with the intent to understand, and will speak with good purpose.
5. Discussion of the School and/or Governing Board matters will be limited to the intent of perpetuating the good of the School.
6. All public property will be treated as such, and will not be used for personal purposes.
7. Relevant parties will accept as their personal duty the responsibility to administer the School and public’s business with professional competence, openness, honesty, fairness, impartiality, efficiency and effectiveness.
8. Personnel and student information will be maintained in strictest confidence.
9. All actions will be structured for the long-term best interest of all stakeholders and guided by Voyager:

A Public Charter School Core Principles:

The Golden Rule,
All One Family
And
Unity in Diversity

B. HAWAII STATE ETHICS CODE

In addition to Voyager’s Principles of Ethical Conduct employees and board member are also subject to restrictions contained in the State Ethics Code. Though the list is intended to be comprehensive, those subject to the State Ethics Code should not hesitate to contact the Hawaii State Ethics Commission whenever ethics issues arise, or if



there are any questions regarding the scope of the following restrictions. Go to www.ethics.hawaii.gov for additional guidance and current contact information:

1. Gifts: Do not accept or solicit gifts unless you are sure of the application of the gifts section of the State Ethics Code, HRS § 84-11.

2. Gifts Disclosure: If you receive more than \$200 of legally acceptable gifts from a single source between June 1 of one year and June 1 of the following year, check with the Hawaii State Ethics Commission as to whether you need to file a gifts disclosure form.

3. Confidential Information: Do not disclose, or use confidential information for your, or anyone's, personal benefit.

4. Favoritism; Fair Treatment: Do not use, or attempt to use, your official position to give yourself or anyone any preferential treatment or any unwarranted advantage.

5. Supplemental Compensation: Do not accept extra pay or anything of value in conjunction with the performance of your official duties, unless provided for by law.

6. State Resources: Do not use state time, equipment (computers, e-mail, etc.), facilities, personnel, the state seal, office supplies or other state resources for private business purposes or political campaigning. The term "business" includes non-profit organizations.

7. Financial Transactions with Subordinates: Do not engage in substantial financial transactions with subordinates, or persons or businesses you inspect or supervise. Check with our office as to the meaning of "substantial," as the application of the term may be different depending on the circumstances.

8. Conflicts of Interests: Do not take official action if the action affects your financial interests, or a business or undertaking in which you have a financial interest, unless you are sure of the application of the State Ethics Code. The financial interests of a spouse or dependent child are treated the same as your financial interests. Also, do not take action affecting an undertaking in which you, in your private capacity, represent a person or business. (Note: This section does not apply to legislators.)

9. Acquiring New Employment or Financial Interests: Do not accept new employment, or new financial interests without checking with our office, if the business or undertaking you will work for, or have a financial interest in, may be subject to official action by you. (Note: This section does not apply to legislators.)

10. Contingent Compensation: Do not assist or represent a person or business before a state or county agency for contingent compensation. (Note: Courts are not considered state agencies.)

11. Representing or Assisting Persons or Businesses: Do not assist or represent (1) a person or business for compensation before your own department or agency, or (2) on matters you have been officially involved in, or (3) on matters you will be officially involved in.

12. State Contracts: (1) If you contract with the State, or have a significant interest in a company that contracts with the State, make sure the contract is awarded in accordance with HRS § 84-15(a). (2) Check with the Hawaii State Ethics Commission office before privately assisting or representing a person or business trying to obtain a state contract, if you have been involved officially with the contract or its subject matter.

13. Post Employment: After leaving your state agency or department, (1) do not disclose confidential information or use such information for your, or anyone's personal benefit; (2) for one year do not personally represent any person or business for compensation on matters before your former agency or department unless you are sure of the application of the State Ethics Code; and (3) for one year, do not personally represent a person or business for compensation regarding matters you have participated in officially. (NOTE: Parts (2) and (3) apply to those who served the State for more than 180 days. Contact the Hawaii State Ethics Commission regarding the definition of the term "personal representation".)

C. DISCLOSURE

1. Governing Board members or other insiders must disclose any self-interest in a transaction which may be a potential source of conflict of interest. Suspect transactions will be referred to the full Governing Board for review. The Board will convene a meeting to analyze the transaction as a potential source of conflict of interest or self-dealing, and will critically evaluate transactions with the following questions:



a. Is there a potential conflict of interest? Conflicts of interest arise when an employee or Board Member has competing interests or loyalties that either are, or potentially can be, at odds with each other.

b. Is there a potential source of financial interest? Financial interest can be in the form of ownership interest in a business, employment or prospective employment, director or officer, ownership of real property or personal property, loan or other debtor interest, creditor interest in solvent business.

c. Is an insider or disqualified individual involved? An insider is not limited to employees or board members who may be in a position to exercise control over an organization. Independent contractors and other apparent third-parties may be “insiders”.

d. Is there an act of self-dealing?

2. In making its determination, the Board will exclude the relevant party from the decision making process. The Board may also contact the Hawaii State Ethics Commission for advice and guidance. If it is determined there is the possibility of a potential or existing conflict of interest or the appearance of a conflict of interest, the transaction will be disqualified. The discussion and determination will be recorded in the minutes of the meeting.

D. DISCLOSURE QUESTIONNAIRES

1. In order to identify potential conflicts of interest, Governing Board Members, teachers, staff, and regularly scheduled volunteers must complete the School’s Disclosure Questionnaire as part of the final selection process. The Governing Board will review completed Questionnaires to determine whether potential conflicts of interest exist. Questionable submissions will be discussed in a Governing Board meeting. Once a conflict of interest determination is made, the Board must resolve the conflict. Resolution may include but is not limited to:

- a. Disqualifying the individual or related entity’s ability to engage in business with the School.
- b. Disqualifying the individual from performing services for or providing goods to the School.

Discussion, determination, and resolution will be recorded in meeting minutes.

2. Once a Questionnaire has been submitted, reviewed, and accepted, it is the submitting individual’s responsibility to inform the School of any changes in status or relationships that may potentially result in a conflict of interest. If any changes have occurred, the individual will complete and submit a new Questionnaire for review and determination. The School or Governing Board at its discretion may also require an individual to complete and submit an updated Questionnaire for review.

F. NEPOTISM POLICY

Relatives of employees are not eligible for employment at Voyager: A Public Charter School. The term “relative” includes grandparents, step-parents, siblings, children, step-children, grandchildren, parents, spouses, aunts, uncles, nieces, and nephews.