

**Workforce Development Council of Seattle-King County**  
**Policy # 09-2002      FINAL**  
**CONFLICT OF INTEREST**

**PURPOSE**

To provide the organization with a Conflict of Interest (Code of Conduct) policy to maintain fairness and equity in its decision-making and awarding and allocation of WIA monies as well as any other monies received from grants awarded the Workforce Development Council (WDC).

**REFERENCE**

Public Law 105-220, Section 111(f)  
Public Law 105-220, Section 117(g)  
20 CFR 667.200(a)(4)(i)&(ii)  
29 CFR 95.42  
29 CFR 97.36(b)(3)

**DEFINITIONS**

- Conflict of Interest:** An individual would personally benefit, usually monetarily, from his or her inclusion in the decision making process.
- Immediate Family:** Immediate family consists of the individuals' parents (including step-parents), spouse, domestic partner, children (including step-children), siblings, grandchildren, grandparents, and any relative by marriage (an 'in-law').
- Individual:** An employee, officer, board member or agent of the WDC.
- Partner:** A business associate of an individual, whether an equal participant in a business with the individual, a supervisor or sub-ordinate.

**REQUIREMENTS**

Before any matter is brought before any committee of the WDC for action, an individual who believes they may have a conflict of interest must announce that

fact to the voting body and excuse themselves from any further discussion and/or vote on the matter in question.

## **PROCEDURE**

1. No individual shall participate in the selection, award, or administration of a contract supported by WIA or Federal funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the individual, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award. The individual shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub agreements. However, the WDC may set standards for situations in which the gift is an unsolicited item of nominal value and can be shared by the members of the organization as a whole. The standards of conduct shall provide for disciplinary actions, up to, and including termination of employment or board membership, for violations of this policy by any individual.
2. Each contractor and subcontractor shall maintain a written code of standards or conduct governing the performance of persons engaged in the award and administration of WDC contracts and subcontracts.
3. Each contractor and subcontractor shall ensure that no person in a decision-making capacity shall engage in any activity, including participation in the selection, award, or administration of a contract or subcontract supported by WDC funds if a conflict of interest, real, implied or apparent, would be involved.
4. An individual of the WDC shall not cast a vote, nor participate in any decision-making capacity on the provision of services by such individual (or any organization which that individual directly represents), nor any matter which would provide any direct financial benefit to the individual, to the individual's immediate family, or to the individual's organization.
5. Individuals shall not use, for their own private gain, for the gain of others, or for other than officially designated purposes, any information obtained as a result of their committee, board or working relationships with the WDC and not available to the public at large, or divulge such information in advance of the time prescribed for its authorized release.